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2016 DEC 22 PM 4: 18

December 22, 2016

Jeff S. Jordan
Assistant General Counsel
Federal Election Commission
Office of Complaints Examination and Legal Administration
999 E Street, NW
Washington, DC 20463

Re: MURs 7169, 7170, 7171, 7172, 7173, 7174, 7175, 7176, 7177, 7178, 7179, 7182, 7187, and 7188

Dear Mr. Jordan:

In response to the complaints filed by the Foundation for Accountability and Civic Trust ("FACT" or the "Complainant"), we write as counsel to DCCC and Kelly Ward in her official capacity as treasurer in MURs 7169, 7170, 7171, 7172, 7173, 7174, 7175, 7176, 7178, 7179, 7182, 7187, and 7188 (collectively, the "Complaints"); Santarsiero for Congress and Lora Haggard, in her official capacity as treasurer, in MUR 7169; Ruben Kihuen for Congress and Jay Petterson, in his official capacity as treasurer, in MUR 7170; Nelson for Wisconsin and Dr. Beth Gillis, in her official capacity as treasurer, in MUR 7171; Colleen Deacon for Congress and Jennifer May, in her official capacity as treasurer, in MUR 7172; Applegate for Congress and Douglas Applegate, in his official capacity as treasurer, in MUR 7173; Mowrer for Iowa and Dennis Skinner, in his official capacity as treasurer, in MUR 7174; Texans for Pete and Wayne Alexander, in his official capacity as treasurer, in MUR 7175; Suzanna Shkreli for Congress and Jennifer May, in her official capacity as treasurer, in MUR 7176; Carroll for Colorado and Mitchell S. Wright, in his official capacity as treasurer, in MUR 7177; Eggman for Congress and Jay Petterson, in his official capacity as treasurer, in MUR 7178; Stephanie Murphy for Congress and Jennifer May, in her official capacity as treasurer, in MUR 7179; Bryan Caforio for Congress and Gonzalo Freixes, in his official capacity as treasurer, in MUR 7182; Friends of Christina M. Hartman and Diane Toapkian, in her official capacity as treasurer, in MUR 7187; and LuAnn Bennett for Congress and Jennifer May, in her official capacity as treasurer, in MUR 7188 (collectively, "Respondents" and individually, each a "Respondent").

#### INTRODUCTION

These Complaints involve advertisements paid for by the DCCC that supported the election of the named Democratic congressional candidates, and that also opposed the

election, actions, or policies of Donald J. Trump, the Republican candidate for President. The Complaints present three legal issues, none of which is new or complicated: (1) whether the DCCC properly attributed the costs of the advertisements among the multiple candidates appearing in them according to 11 C.F.R. § 106.1(a); (2) whether the DCCC correctly accounted for the portion of the expenses attributed to Donald Trump; and (3) whether the DCCC and the congressional campaigns refrained from coordinating the ads with Hillary for America ("HFA"), so that none of their costs would represent in-kind contributions to HFA.

Because the answer to each of these questions is yes, there is no reason to believe Respondents violated the Federal Election Campaign Act of 1971, as amended (the "Act") or the regulations of the Federal Election Commission (the "FEC" or "Commission"):

First, the DCCC followed the process mandated by Commission regulations and long-standing Commission authority and attributed the cost of the advertisements among the multiple candidates appearing in them on a time-space basis, "according to the benefit reasonably expected to be derived." The Complaints ignore clear Commission authority requiring attribution among multiple candidates in this case of advertisements like these and present no facts to show that any attribution was done incorrectly. Instead, relying solely on one inaccurate news article, they simply assume that the advertisements were misattributed under the concept of "hybrid advertising" based on a generic party reference, which was not the case. These advertisements simply present a text book example of appropriately attributing expenditures under 11 C.F.R. § 106.1(a).

Second, the facts show that the DCCC correctly accounted for and reported the expenses attributable to Donald Trump. Some of the advertisements expressly advocated Trump's defeat, while others did not. The first were reported as independent expenditures, while the second were not, according to the Act and Commission regulations:<sup>3</sup>

Moreover, as a national party committee, the DCCC had an interest both in urging Donald Trump's defeat and criticizing his policies, above and beyond its central mission of supporting House candidates. Donald Trump was at the top of the ticket and the face of the Republican Party. He advocated policies and took actions strongly opposed by Democratic Party adherents. By expressly advocating Donald Trump's defeat, and by criticizing policy positions he espoused, that were strongly identified with him in the public mind, the DCCC alternatively promoted his defeat and mobilized Democratic opposition to his policies, the latter of which also helped support the ticket as a whole.

Third, none of the advertisements at issue was coordinated with HFA. In fact, the DCCC and campaigns took specific steps to avoid coordination with HFA. The Complaints present no facts to support any claim of coordination, but simply assume that it must have

<sup>&</sup>lt;sup>1</sup> 11 C.F.R. § 106.1(a)(1).

<sup>&</sup>lt;sup>2</sup> See Scott Bland, Dems use loophole to pump millions into fight for the House, Politico, Oct. 18, 2016, http://www.politico.com/story/2016/10/democrats-house-campaign-moncy-229957.

<sup>&</sup>lt;sup>3</sup> See 11 C.F.R. § 100.16(a) (linking definition of "independent expenditure" to express advocacy).

occurred because a party committee was involved in the advertisements—a presumption that the Supreme Court struck down long ago.<sup>4</sup>

The only factor that makes the resolution of these matters in any way complicated is the Complainant itself. As it has done before, FACT has flooded the Commission with fourteen complaints involving a wide array of respondents, in a clear effort to drain Respondents' resources and burden the Commission, with the ultimate effect of chilling speech and impeding the progress of other, non-frivolous enforcement matters. FACT relied on a single news article to "support" its conclusory allegations and focused the entire Complaints on generic party hybrid advertising that never occurred. The Complaints even carelessly swept up two ads that were attributed entirely to the relevant House campaigns and paid for completely with campaign funds and with coordinated party expenditure authority.

The Respondents complied with longstanding Commission regulations to support and oppose multiple candidates and promote the party as a whole. Because the costs were correctly attributed among multiple candidates, because the ads were correctly reported, and because there was no prohibited coordination with HFA, there is no reason to believe that any violation occurred, and the FEC should immediately dismiss these Complaints.

#### **FACTS**

The DCCC is the House campaign committee of the Democratic Party.<sup>6</sup> Its principal mission is to support Democratic congressional candidates and other candidates around the country. In 2016, as before, a key part of the DCCC's activities involved financing television advertisements. Under Commission rules, the legal treatment of these advertisements varies by content—for example, whether they identify clearly identified candidates and, if so, how many; whether they expressly advocate the candidates' election or defeat; and whether they are coordinated with those candidates. The DCCC has had a long history of not simply making coordinated expenditures in support of House campaigns, but using communications to promote the interests of the Democratic Party as a whole.<sup>7</sup>

The presidential candidacy of Donald Trump provided the DCCC with a unique opportunity to promote Democratic House candidates, oppose Trump's election, and mobilize the Democratic Party against Trump's positions for the benefit of the whole ticket. Trump was a major issue in House campaigns, his defeat was a vital concern for Democratic adherents, and fighting back against his policy positions and actions was important to the party as a whole. The DCCC saw the opportunity to pursue all three of these objectives.

<sup>&</sup>lt;sup>4</sup> See Colorado Republican Fed. Campaign Comm. v. FEC, 518 U.S. 604, 614-15 (1996) (invalidating prohibition on party independent expenditures); McConnell v. FEC, 540 U.S. 93, 214 (2003), overruled in part on other grounds by Citizens United v. FEC, 558 U.S. 310 (2010) (invalidating requirement that party choose between making independent or coordinated expenditures).

<sup>&</sup>lt;sup>5</sup> See FEC MUR 6916, First General Counsel's Report (Oct. 22, 2015).

<sup>&</sup>lt;sup>6</sup> See, e.g., 11 C.F.R. § 110.2(c)(2)(ii).

<sup>&</sup>lt;sup>7</sup> Sec, e.g., FEC Advisory Opinion 1985-14 (DCCC).

These Complaints are about advertisements that the DCCC undertook in service of these multiple objectives. Supervised by a senior DCCC employee, DCCC staff worked with House campaigns to develop and produce the advertisements beginning with script development through the advertising buying phase. 8 Each of the advertisements involved explicit references to clearly identified House candidates and a clearly identified discussion of Donald Trump and were accounted for according to the following model:

- Some of the advertisements expressly advocated the defeat of both the Republican House candidate and Trump. (e.g., "Vote No on [Republican congressional candidate] and Donald Trump"). In these cases, the DCCC paid for and reported the portion of the advertisement attributable to Trump as an independent expenditure opposing him. The remainder was either paid entirely by the Democratic congressional campaign, or split between the campaign and the DCCC, with the DCCC treating its share of the remainder as a coordinated expenditure. Advertisements that included express advocacy against Donald Trump are discussed in MURs 7169, 7170, 7171, 7174, 7176, and 7182.10
- Other ads mentioned both House candidates and Donald Trump, but did not expressly advocate Trump's defeat. Rather, these ads focused on Trump's positions on key issues like national security, immigration, women's health, or gun control and his actions causing unrest and harm to the country. In these cases, the portion of the advertisements that concerned congressional candidates was either paid in whole by the Democratic House campaign, or split between the campaign and the DCCC using funds available under the coordinated party expenditure limits. 11 The remainder was paid for by the DCCC and reported as an operating expense. The ads that did not expressly advocate Trump's defeat are discussed in MURs 7172, 7175, 7177, 7178, 7179, and 7188. 12

In all of these advertisements, the DCCC attributed the relevant expenses between the referenced candidates—i.e., the House candidate and Donald Trump—on a time/space basis,

11 See Exhibit B.

<sup>&</sup>lt;sup>8</sup> See Exhibit A (affidavit of Michael Ian Russell)..

<sup>&</sup>lt;sup>9</sup> See Exhibit B (relevant pages of FEC reports).

The advertisement in MUR 7169 can be found here: https://www.youtube.com/watch?v=7mb2DsowG00. The advertisement in MUR 7170 can be found here: https://www.youtubc.com/watch?v=ulkmwN7ivMU. The advertisement in MUR 7171 can be found here: https://www.youtube.com/watch?v=LS-gU95vm9U. The advertisement in MUR 7174 can be found here: https://www.youtube.com/watch?v=g\_4kBjw8r-U. The advertisement in MUR 7176 can be found here; https://www.youtube.com/watch?v=WCx3ObETyrE. The advertisement in MUR 7182 can be found here: https://www.youtube.com/watch?v=i18196BhvWg&feature=youtu.be.

<sup>12</sup> The advertisement in MUR 7172 can be found here: https://www.youtubc.com/watch?v=nwdljKSaFdQ. The advertisement in MUR 7175 can be found here: https://www.youtubc.com/watch?v=GJCZwJ3tYXw. The advertisement in MUR 7177 can be found here:

https://www.youtubc.com/watch?v=7KxcnuejChU&feature=youtu.be. The advertisement in MUR 7178 can be found here: https://www.youtube.com/watch?v=HIxNUxf-t80. The advertisement in MUR 7179 can be found here: https://www.youtube.com/watch?v=OpdilznhrF4. The advertisement in MUR 7188 can be found here: https://www.youtube.com/watch?v=epFwW3WyOWo. For the advertisement in MUR 7177, the Colorado Democratic Party similarly split the costs of the advertisement with Carroll for Colorado on a time/space basis.

determining the portion of each ad that related to each candidate and allocating accordingly. As mentioned above, two of the Complaints involved ads that were paid for entirely with campaign funds, and with DCCC funds used under the coordinated party expenditure limit. 13

All of the advertisements discussed in the Complaints were conceived and executed by the DCCC independently of HFA or its agents. 4 Bccause the ads would refer to Trump, the staff and campaigns were instructed not to coordinate them with HFA or its agents. 15 The Complaints make no specific allegation of coordination whatsoever, and the declarations accompanying this response demonstrate the absence of any request, suggestion, assent, substantial discussion or material involvement. 16 The declarations demonstrate also that there was no coordination through any common vendor, former employee or independent contractor. 17

#### LEGAL ANALYSIS

- l. The Costs of the Advertisements Were Properly Attributed Among Multiple Candidates According to the Benefit Reasonably Expected to Be Derived
  - A. Commission rules clearly provide for attribution among multiple candidates.

11 C.F.R. § 106.1(a) provides that "expenditures, including in-kind contributions, independent expenditures, and coordinated expenditures made on behalf of more than one clearly identified Federal candidate shall be attributed to each such candidate according to the benefit reasonably expected to be derived."18 For a television ad, the regulation is explicit about how to make this attribution: it "shall be determined by the proportion of space or time devoted to each candidate as compared to the total space or time devoted to all candidates."19 The Commission has repeatedly and consistently applied this regulation when evaluating communications that refer to multiple candidates. 26 For example, when an advertisement identifies candidates in multiple races, the expenditure is attributed based on the time/space dedicated to each race (e.g., the time dedicated to advocating a congressional candidate and her opponent would be attributed separately from the time spent advocating for a presidential candidate).<sup>21</sup> The portions of the broadcast communication that is dedicated to the legally

<sup>13</sup> The advertisement in MUR 7173 can be found here: https://www.youtube.com/watch?v=RriiljNAe-I. The advertisement in MUR 7187 can be found here: https://www.youtube.com/watch?v=8DNOEgLEECA. See Exhibit B.

14 See Exhibit A.

<sup>16</sup> Id.: see also Exhibit C (affidavit of media vendors).

<sup>&</sup>lt;sup>17</sup> The vast majority of vendors working on the ads at issue in these matters did not work for HFA. Two vendors who did work on two different advertisements also did work for HFA but did not use any non-public information about HFA's plans, projects, activities, or needs in working on the advertisement. See Exhibit C.

<sup>18 11</sup> C.F.R. § 106.1(a).

<sup>&</sup>lt;sup>20</sup> See FEC Adv. Op. 2010-10 (NRL PAC); FEC Adv. Op. 2004-37 (Waters) ("attribution shall be determined by the proportion of space devoted to each candidate") (citing 11 C.F.R. § 106.1(a)(1)). <sup>21</sup> FEC Adv. Op. 2010-10 (NRL PAC).

required disclaimer and "stand by your ad" messages do not count for either candidate, but rather are split proportionately to the rest of the communication's content.<sup>22</sup>

In attributing the cost of a communication among multiple candidates, the Commission does not look to whether or not the segment associated with a particular candidate contains express advocacy. For example, in Advisory Opinion 2004-01, issued to Bush-Cheney '04, Inc. and Alice Forgy Kerr for Congress, the Commission understood that the ad would "not mention or refer to the President's candidacy for re-election [or] expressly advocate the election nor defeat of any presidential candidate." Still, the Commission confirmed that the costs of the communication must be attributed between the two campaigns based on the proportion of space or time devoted to each candidate under 11 C.F.R. § 106.1(a), even though the ad expressly advocated one candidate's election and not the other's. Similarly, in Advisory Opinion 2010-10, the Commission held that when a broadcast communication expressly advocated the election of one candidate, referred to an opposing candidate without expressly advocating defeat, and expressly advocated the election of a third candidate in an altogether different race, the references to the opposing candidate would be attributed to the first candidate under 11 C.F.R. § 106.1(a).

The Commission has applied section 106.1's attribution principles even when only one candidate is referenced but the ad concerned multiple purposes. For example, in Advisory Opinion 2004-29, the Commission allowed Representative Todd Akin to appear in an ad supporting a ballot issue committee, but advised his campaign only to "reimburse the sponsor of the advertisement for the attributable portion of the cost of these coordinated communications," despite the fact that no candidate besides Akin would appear in the ad. 26 And in Advisory Opinion 2006-11, the Commission considered a state party mailing that would expressly advocate for a federal candidate and for other generically referenced candidates of the party committee. 27 The Commission held that, while no less than 50% of the costs could reasonably be attributed to the one identified candidate, "it is appropriate to apply analogous 'space or time' principles set out in 11 C.F.R. 106.1(a)" and that "the benefit reasonably expected to be derived by the clearly identified candidate should be

<sup>&</sup>lt;sup>22</sup> Specifically, the Commission has advised that the disclaimer component of the communication should be attributed among the candidates or purposes "in the same proportion as the time or space" devoted to each race or purpose. FEC Adv. Op. 2010-10 (NRL PAC) at 6; see also FEC Adv. Op. 2007-09 (Kerry-Edwards) (permitting disclaimer to be attributed among multiple purposes). For instance, in NRL PAC, the FEC stated that, where 16 seconds of a 30-second advertisement are devoted to advocating for a presidential candidate, 8 seconds are devoted to advocating against a Senate candidate, and 6 seconds are devoted to a disclaimer, two-thirds of the expenditure should be reported as having been made in support of the presidential candidate and one-third should be reported as having been made in opposition to the Senate candidate. FEC Adv. Op. 2010-10 at 6 n.7. In Kerry-Edwards, the Commission found that the portion of broadcasting costs incurred by the Kerry-Edwards Campaign in complying with disclaimer requirements were expenses that may be paid for with legal funds. See FEC Adv. Op. 2007-09.

<sup>23</sup> FEC Adv. Op. 2004-01 (Bush/Kerr).

<sup>&</sup>lt;sup>24</sup> Id. at 6. The Commission has since adopted a specific exemption from the coordination rules that vitiates the general attribution rule in the case of certain "endorsement" ads. See 11 C.F.R.§ 109.21(g). However, that exception is not at issue in these matters.

<sup>&</sup>lt;sup>25</sup> FEC Adv. Op. 2010-10 (NRL PAC).

<sup>&</sup>lt;sup>26</sup> FEC Adv. Op. 2004-29 (Akin) at 6.

<sup>&</sup>lt;sup>27</sup> FEC Adv. Op. 2006-11 (Washington Democratic State Central Committee).

measured by determining the amount of space devoted to the clearly identified candidate as compared to the amount of space devoted to the generically referenced party candidates."<sup>28</sup>

Although the ads aired by Respondents are not so-called "hybrid" ads like those in Advisory Opinion 2006-11, the Commission has nonetheless found that ads that concern candidates, issues, and the party generally are allocated just like ads that concern multiple candidates. The Act "generally permit[s] (and in some cases require[s]) the allocation of expenses attributable to more than one purpose" and "allocation is an appropriate way to fund activities with multiple purposes" as held over and over by the Commission. <sup>29</sup> These ads that— in each case—referred to two candidates in two different elections, sometimes expressly advocating Trump's defeat and sometimes opposing his policy positions, were allocated in accordance with these longstanding Commission interpretations.

#### B. Respondents attributed the advertisements correctly.

The advertisements in MURs 7169, 7170, 7171, 7172, 7174, 7175, 7176, 7177, 7178, 7179, 7182, and 7188 were all correctly attributed among the Democratic House candidates and Donald Trump, just as 11 C.F.R. § 106.1(a) and Commission authority contemplate. The plain language of 11 C.F.R. § 106.1(a) requires that when an expenditure for a broadcast communication clearly identifies more than one Federal candidate, the costs shall be attributed as determined by "the proportion of space or time devoted to each candidate as compared to the total space or time devoted to all candidates." The FEC has additionally confirmed that when an advertisement mentions two opponents running for the same office and a third candidate for a different office, the costs are "allocated among the electoral races, based on a time or space analysis." This is how Respondents attributed the costs of these advertisements in this case.

All of the ads at issue referred to clearly identified House candidates and Donald Trump, a clearly identified presidential candidate running. The portions of the ads that were spent discussing the House candidates were attributed to the Democratic House candidate. Conversely, the portions of the ads that were spent discussing Trump were attributed to Trump. If a portion of an ad concerned both the House candidate and Trump, that period of time was attributed between the two races on a reasonable basis. The portion of each ad that was spent displaying the written, visual, and spoken disclaimer as mandated by law was allocated between the two races "in the same proportion as the time or space" devoted to each race in the other portions of the ad, just as the Commission instructed in Advisory Opinion 2010-10.

<sup>&</sup>lt;sup>28</sup> *Id*. at 4.

<sup>&</sup>lt;sup>29</sup> See FEC Adv. Op. 2010-14 (DSCC) (approving allocation of expense between campaign and recount activities); see also FEC Adv. Op. 1988-06 (Gore for President) (holding that "expenditures within the purview of the Act may be made for multiple purposes [and] the Commission believes that expenditures to run an advertisement which includes a fundraising solicitation may be allocated on a 'reasonable basis'"); First General Counsel's Report at 22, FEC Matter Under Review 4131(holding that multi-purpose mailers that include express advocacy of candidates and a solicitation for contributions to a state PAC should be allocated between the mixed purposes).

<sup>30</sup> FEC Adv. Op. 2010-10 (NRL PAC).

Take, for example, the advertisement sponsored by the DCCC and Mowrer for Iowa at issue in MUR 7174.31 The advertisement contains express advocacy against Representative David Young and Donald Trump. The advertisement criticizes the positions of both Trump and Young and ends by saying, "Vote No on Donald Trump and David Young." The ad starts with approximately 5 seconds concerning Donald Trump and is followed by 4 seconds attributable to the House race, 5 seconds attributable to Trump, 4 seconds attributable to the House race, 3 seconds attributable to Trump, 5 seconds attributable to the House race, and finally 4 seconds containing the legally required disclaimer. The first 26 seconds of the advertisement were equally divided between the congressional race and Donald Trump and the portion of the advertisement spent dedicated to the disclaimer was split on the same proportion. The advertisement was attributed 50% to the Mowrer campaign and 50% to Donald Trump.

Consider also the ad sponsored by the DCCC and Colleen Deacon for Congress at issue in MUR 7172.<sup>32</sup> The ad critiques the positions of both Rep. John Katko and Donald Trump, but does not expressly advocate Trump's defeat. The ad starts with approximately 4 seconds equally attributable to both the House race and Trump and is followed by 2.5 seconds attributable to Trump, 3.5 seconds attributable to the House race, 8 seconds attributable to Trump, 7 seconds attributable to the House race, 3 seconds equally attributable to both the House race and Trump, and ends with 2 seconds dedicated to the disclaimer. The first 28 seconds of the advertisement were equally divided between the House race and Trump, the portion of the advertisement spent dedicated to the disclaimer was split on the same proportion, and so the advertisement was attributed 50% to the Deacon campaign and 50% to Trump. The same methodology was used to attribute the ads generally, and the Complaints provide no basis to question Respondents' attribution.

#### C. The expenses attributed to the House candidates were correctly reported.

The portion of the ads attributable to the House candidates were paid for and reported as required by the Act and Commission regulations. In almost every case, and as reported to the Commission, the relevant Democratic House campaign directly paid the relevant media vendor for its attributable portion of the costs. In two cases—the ad sponsored by the DCCC and Nelson for Wisconsin in MUR 7171, and the ad sponsored by the DCCC and Shkreli for Congress in MUR 7176—the DCCC paid for some of the portion of the expenses that were attributable to the House campaign as a coordinated expenditure. For the Nelson campaign, the DCCC paid \$33,700 of the costs attributable to the campaign, and for the Shkreli ad, the DCCC paid \$52,960. These payments were well within the DCCC's coordinated party expenditure limits for each race and were reported to the Commission.<sup>33</sup> The Commission has repeatedly held that when a federal campaign pays for the portion of an advertisement

<sup>&</sup>lt;sup>31</sup> Jim Mowrer, *Now We Understand*, YouTube (Oct. 19, 2016), https://www.youtube.com/watch?v=g\_4kBjw8r-U. <sup>32</sup> Colleen Deacon, *Unsettled*, YouTube (Oct. 8, 2016), https://www.youtube.com/watch?v=Ch4ToJp3Br0.

that is attributable to the relevant candidate under 11 C.F.R. § 106.1(a), no contribution results from the payment of the remaining portion of the expenses for the advertising.<sup>34</sup>

Contrary to FACT's speculative and unfounded allegations, the DCCC did not make any excessive contributions to any of the House campaigns, because the expenses attributable to those campaigns were either paid for by the campaigns themselves, or by the DCCC under its coordinated expenditure authority.

D. Two of the communications at issue were paid for entirely by the House campaigns and the DCCC as coordinated party expenditures.

For reasons known only to FACT, that organization filed two complaints regarding ads paid for entirely by the relevant Democratic House campaign and under the DCCC's coordinated party expenditure authority. Given the way that they were funded, these expenditures for these ads cannot possibly amount to excessive contributions from the DCCC to the House campaign. MUR 7173 concerns an ad sponsored by the DCCC and Applegate for Congress. The DCCC spent a total of \$91,200 to assist in the airing of this ad and Applegate for Congress paid for all other expenses associated with its creation and airing. The funds spent by the DCCC toward the ad were treated as coordinated party expenditures and reported accordingly.<sup>35</sup>

Similarly, MUR 7187 concerns an advertisement sponsored by the DCCC and Friends of Christina M. Hartman. The DCCC spent a total of \$96,070 to assist in the airing of this ad and Friends of Christina M. Hartman paid for all other expenses associated with its creation and airing. The funds spent by the DCCC toward this ad were treated as coordinated party expenditures and reported accordingly.<sup>36</sup>

Thus, in MURs 7173 and 7187, not even the question of attribution was present. At no point was there any basis for FACT to allege any violation of the limits as to the House campaigns.

### II. The Portions of the Ads Attributable to Donald Trump Were Correctly Reported

Except in MUR 7177, the portions of the ads referenced by the Complaints and attributable to Donald Trump were paid for by the DCCC. In MUR 7177, the portion of the ad attributable to Trump was paid for by the Colorado Democratic Party. In each case, the party committee either filed the necessary independent expenditure report as to Trump or

<sup>&</sup>lt;sup>34</sup> See FEC Adv. Op. 2004-37 (Waters) at 2 (holing that payment for a "brochure would not constitute support of, or be an in-kind contribution to, the Federal candidates listed in the brochure, provided that the Federal candidates provide reimbursements in the appropriate amount in a timely manner"); FEC Adv. Op. 2004-01 (Bush/Kerr) at 6 (holding that "if the Bush-Cheney Committee reimburses the Kerr Committee for its attributable share of the expenses, there is no contribution"); FEC Adv. Op. 2004-29 (Akin).

<sup>35</sup> See Exhibit B.

<sup>&</sup>lt;sup>36</sup> Id.

reported the attributable portion of the ad as operating expenditures, depending on whether the ad contained express advocacy.

To be an independent expenditure, a communication must include "express advocacy" for or against a "clearly identified" candidate.<sup>37</sup> However, although all of the relevant ads "clearly identified" Trump under 11 C.F.R. § 100.17, only the ads at issue in MURs 7169, 7170, 7171, 7174, 7176, and 7182 included "express advocacy" against him.<sup>38</sup> In these latter cases, the DCCC reported the portions of the ads attributable to Trump as independent expenditures opposing him.<sup>39</sup>

The ads in MURs 7172, 7175, 7177, 7178, 7179, and 7188 did not expressly advocate Trump's defeat. Accordingly, the portions of these ads' costs that were attributable to Trump were reported by the party as operating expenditures and not as independent expenditures. The definition of "express advocacy" is clearly set forth in the Commission's regulations, and when a communication does not meet this definition, the Commission has repeatedly held that the communication does not constitute an independent expenditure. 40

A communication expressly advocates if it: uses phrases such as "vote for the President," "Smith for Congress," or "Bill McKay in '94," or uses campaign slogans or individual words, which in context "can have no other reasonable meaning than to urge the election or defeat of one or more clearly identified candidates," such as a message saying "Nixon's the One," or "Carter '76," or when taken as a whole and with limited reference to external events, "could only be interpreted by a reasonable person as containing advocacy of the election or defeat" of a candidate because the "electoral portion of the communication is unmistakable, unambiguous, and suggestive of only one meaning" such that reasonable minds "could not differ as to whether it encourages actions to elect or defeat" the candidate. A message constitutes express advocacy "only if it contains a clear call to a specific electoral

<sup>38</sup> Dangerous for PA Women, YouTube (Oct. 20, 2016) at :20 ("Say No To Donald Trump & Brian Fitzpatrick"), <a href="https://www.youtube:com/watch?v=7mb2DsowG00">https://www.youtube:com/watch?v=7mb2DsowG00</a>; Ruben Kihuen for Congress, Our Values, YouTube (Oct. 18, 2016) at :23 ("Vote NO on Cresent Hardy and Donald Trump"),

https://www.youtube.com/watch?v=g\_4kBjw8r-U; Suzanna Shkreli for Congress, Brags, YouTube (Oct. 14, 2016) at :22 ("Vote No on Donald Trump and Mike Bishop"), https://www.youtube.com/watch?v=WCx3ObETyrE; Bryan Caforio for Congress, Stand Up, YouTube (Oct. 12, 2016) at :27 ("Vote No on Trump"), https://www.youtube.com/watch?v=i18196BhvWg&feature=youtu.be.

<sup>&</sup>lt;sup>37</sup> 11 C.F.R. § 100.16.

https://www.youtube.com/watch?v=ulkinwN7ivMU; Nelson for Wisconsin, No, YouTube (Oct. 10, 2016) at :25 ("Mike Gallagher says we still have to support Donald Trump. No, we don't; we don't have to support Mike Gallagher either"), https://www.youtube.com/watch?v=LS-gU95vm9U; Jim Mowrer, Now We Understand, YouTube (Oct. 19, 2016) at :28 ("Vote No on Donald Trump and David Young"),

<sup>&</sup>lt;sup>39</sup> See Exhibit D (excerpts from relevant independent expenditure reports). There would have been no basis to consider the portions of the advertisements attributable to Trump as coordinated communications with the House campaigns. See Coordinated and Independent Expenditures, 68 Fed. Reg. 421, 431 (Jan. 3, 2003) (conduct standard cannot "be satisfied without some link between the request or suggestion and the candidate or political party who is, or that is, clearly identified in the communication").

<sup>&</sup>lt;sup>40</sup> See, e.g., FEC Adv. Op. 1985-14 (DCCC).

<sup>&</sup>lt;sup>41</sup> 11 C.F.R. § 100.22.

action."<sup>42</sup> Even according to the Ninth Circuit, which has taken a very expansive approach to defining express advocacy:

Speech cannot be "express advocacy of the election or defeat of a clearly identified candidate" when reasonable minds could differ as to whether it encourages a vote for or against a candidate or encourages the reader to take some other kind of action. We emphasize that if any reasonable alternative reading of speech can be suggested, it cannot be express advocacy subject to the Act's disclosure requirements.<sup>43</sup>

Even by this broad standard, the advertisements at issue in MURs 7172, 7175, 7177, 7178, 7179, and 7188 did not include any words of express advocacy regarding Trump. In each case, a reasonable alternative reading exists for the communication as it pertains to Trump, insofar as they criticize his policy positions and their negative effects.

Several of the advertisements discuss Republican congressional candidates "support" for Donald Trump's positions. For example, in the advertisement at issue in MUR 7172 the script is as follows:

VOICE OVER: In an unsettled world, John Katko and Donald Trump's approach takes us down a dangerous path. [Showing footage of global unrest].

TRUMP: "I love war in a certain way."

VOICE OVER: But when asked about supporting Trump, Katko said ...

KATKO: "I absolutely will support."

TRUMP: "Tell them to go f--- themselves."

VOICE OVER: When national security leaders condemn Trump's reckless statements on foreign policy...

INTERVIEWER: "People are wondering how those things can happen and you not flat out denounce it?"

KATKO: "I'm more concerned about my race."

VOICE OVER: Not about the safety of our families. Trump and Katko put our national security at risk.

[DISCLAIMER].44

<sup>&</sup>lt;sup>42</sup> Statement of Reasons of Vice Chairman Petersen and Commissioners Hunter and McGahn at 4, Matter Under Review 6113 (Dec. 18, 2009).

<sup>&</sup>lt;sup>43</sup> FEC v. Furgaich, 807 F.2d 857, 864 (9th Cir. 1987).

<sup>44</sup> Colleen Deacon, Unsettled, YouTube (Oct. 8, 2016), https://www.youtube.com/watch?v=Ch4ToJp3Br0.

However, the word "support" in this context cannot only be interpreted as a call to vote against Donald Trump. Rather, it is intended to critique Donald Trump's desire for war, dangerous foreign policy "approach," and other previous actions and policy positions and Representative Katko's support of Trump despite these positions. This advertisement concludes with the statement that "Trump and Katko put our national security at risk." The advertisement does not say that viewers should vote against Donald Trump for President but refers to the contemporaneous actions of both Representative Katko and Donald Trump that are adverse to the United States' national security interests.

Similarly, consider the advertisement at issue in MUR 7175. The script of advertisement is as follows:

TRUMP: We're going to build a wall.

VOICE OVER: Donald Trump is tearing us apart. [SHOWING CURRENT NATIONAL UNREST]. Trump called a judge unqualified because of his Mexican heritage.

TRUMP: He's a Mexican. We're building a wall between here and Mexico.

VOICE OVER: And called Mexicans rapists and murderers. Donald Trump. Too dangerous for us. But Will Hurd says he could still support Donald Trump. And Will Hurd shares the same bad ideas.

WILL HURD: A wall absolutely makes sense.

VOICE OVER: Will Hurd. He's the wrong choice for Texas families.

[DISCLAIMER].45

This advertisement refers to several statements and policy positions of Donald Trump and observes the contemporaneous effects: his positions and actions are "tearing us apart" at this time. The advertisement does not include a call to defeat Donald Trump in the presidential election, but it does include a call to defeat Representative Hurd: it says that he is the "wrong choice for Texas families" because of his support of Donald Trump's positions. Citing Representative Hurd's support for Donald Trump as a reason to defeat Representative Hurd is not express advocacy with regard to Donald Trump. There is no portion of the advertisement that could only be interpreted as a call to vote against Donald Trump and thus the advertisement does not contain express advocacy against Donald Trump as defined at 11 C.F.R. § 100.22. As there is no "express advocacy" or "clear call to a specific electoral action" with regard to Donald Trump in any of the advertisements discussed in MURs 7172, 7175, 7177, 7178, 7179, and 7188, no portion of any of these advertisements should have been reported as independent expenditures opposing Donald Trump.

<sup>45</sup> Wrong Choice for TX Families, YouTube (Oct. 4, 2015), https://www.youtube.com/watch?v=GJCZwJ3iYXw.

Because the portion of the advertisements discussed in MURs 7172, 7175, 7177, 7178, 7179, and 7188 attributable to Donald Trump did not contain express advocacy opposing Trump, they were properly reported by the DCCC and Colorado Democratic Party as operating expenditures. The Commission's regulations and previous decisions are clear: if a party committee airs a communication that does not constitute an independent expenditure or party coordinated communication, the expenses associated with the advertisements, or relevant portions thereof are operating expenditures. 46

### III. The Complaint Presents No Genuine Allegation of Coordination with HFA, and The Facts Demonstrate That None Occurred

None of the relevant advertisements was coordinated with HFA. There was no coordination between the Respondents on the one hand, and HFA on the other, regarding any of the advertisements cited by the Complaints. None of the Complaints alleges any specific facts that could even be taken to suggest coordination.<sup>47</sup>

Instead, the Complaints make the conclusory allegation that the advertisements were coordinated with HFA. However, such pure speculation cannot support a finding of a reason to believe. The Commission may find "reason to believe" only if a Complaint sets forth sufficient specific facts, which, if proven true, would constitute a violation of the Act. <sup>48</sup> For claims of coordination, the Commission requires an even stronger showing: that Complainant provide "probative information of coordination." The Commission has also made clear that "unwarranted legal conclusions [drawn] from asserted facts" or "mere speculation" are *not* sufficient to find reason to believe that Respondents violated the Act through impermissible coordination. Decause the Complaints rely exclusively on pure speculation and unwarranted legal conclusions for their coordination claims, there is no reason to believe any coordination occurred.

The Commission also must consider whether Respondents have provided "sufficiently compelling evidence" to refute the Complaints' claims. In this case, the declarations accompanying this response provide strong, probative evidence of the absence of coordination between Respondents and HFA on these ads. The declaration of Michael Ian Russell, the DCCC's Deputy Executive Director and Political Director, is especially important. Mr. Russell makes clear that he supervised the communications campaign at issue in these Complaints; that it did not involve any request, suggestion or assent from HFA; that he instructed those participating in the program to refrain from any

<sup>&</sup>lt;sup>46</sup> FEC Adv. Op. 1985-14 (DCCC) ("DCCC may report these expenditures as operating expenditures.").

<sup>&</sup>lt;sup>17</sup> See Exhibit A.

<sup>&</sup>lt;sup>48</sup> Statement of Reasons, Commissioners Mason, Sandstrom, Smith, and Thomas, MUR 4960 (Dec. 21, 2001).

<sup>&</sup>lt;sup>49</sup> FEC Matter Under Review 5999, Factual and Legal Analysis (Dec. 15, 2008); see also FEC Matter Under Review 6059, Factual and Legal Analysis, at 6 (Feb. 3, 2009).

FEC Matter Under Review 4960 (Clinton for U.S. Exploratory Committee), Statement of Reasons of Commissioners David M. Mason, Karl J. Sandstrom, Bradley A. Smith, and Scott E. Thomas at 1 (Dec. 21, 2000).
 See Exhibits A and C.

<sup>52</sup> See Exhibit A.

communications with HFA regarding the ads; and that he knows of no deviation from these instructions.<sup>53</sup>

Because the Complaints rely entirely on speculation to mount the claim of coordination, and because Respondents have provided compelling evidence to refute this speculation even when not required to do so, the Commission should dismiss these baseless claims.

#### **CONCLUSION**

The FACT complaints are based completely on an incorrect factual assumption and a blatant misunderstanding of the law. FACT assumed that the Respondents were allocating the advertisements at issue according to the Commission's guidance on generic party hybrid advertising and apparently believe that such hybrid advertising is the only case in which a committee should allocate an advertisement between multiple federal candidates or purposes. In reality, the Commission's regulations provide for the attribution of any communication that concerns multiple Federal candidates. The Respondents followed the Commission's attribution regulations here, and paid for and reported each portion of the advertisements according to the requirements of the Act.

There is absolutely no merit to the allegations in any of the complaints in MURs 7169, 7170, 7171, 7172, 7173, 7174, 7175, 7176, 7177, 7178, 7179, 7182, 7187, and 7188 and the Commission should dismiss all of these complaints against all of the Respondents immediately.

Very truly yours,

Marc E. Elias

Brian G. Svoboda

Mr. B

Graham M. Wilson

Rachel L. Jacobs

Enclosure

Counsel to:

**DCCC** 

Santarsiero for Congress and Lora Haggard, in her official capacity as treasurer Ruben Kihuen for Congress and Jay Petterson, in his official capacity as treasurer Nelson for Wisconsin and Dr. Beth Gillis, in her official capacity, as treasurer Colleen Deacon for Congress and Jennifer May, in her official capacity as treasurer Applegate for Congress and Douglas Applegate, in his official capacity as treasurer

<sup>&</sup>lt;sup>53</sup> Id.

Mowrer for Iowa and Dennis Skinner, in his official capacity as treasurer Texans for Pete and Wayne Alexander, in his official capacity as treasurer Suzanna Shkreli for Congress and Jennifer May, in her official capacity as treasurer Carroll for Colorado and Mitchell S. Wright, in his official capacity as treasurer Eggman for Congress and Jay Petterson, in his official capacity as treasurer Stephanie Murphy for Congress and Jennifer May, in her official capacity as treasurer Bryan Caforio for Congress and Gonzalo Freixes, in his official capacity as treasurer Friends of Christina M. Hartman and Diane Toapkian, in her official capacity as treasurer

LuAnn Bennett for Congress and Jennifer May, in her official capacity as treasurer

## Exhibit A

#### BEFORE THE

#### FEDERAL ELECTION COMMISSION

#### DECLARATION OF MICHAEL IAN RUSSELL

- I, Michael Ian Russell, do declare and state as follows:
  - 1. During the 2016 election, I worked for DCCC as Deputy Executive Director and Political Director. Through that position, I am familiar with the matters discussed herein. At no point during the 2016 election cycle did I serve as an employee, independent contractor, vendor, or agent of Hillary for America ("HFA").
  - 2. As the Deputy Executive Director and Political Director of DCCC, I worked with, and supervised other DCCC employees who worked with, numerous House campaigns on television advertisements that mentioned Donald Trump. Specifically, I worked with (a) Santarsiero for Congress on the advertisement discussed in the complaint in MUR 7169; (b) Ruben Kiluen for Congress on the advertisement discussed in the complaint in MUR 7170 (c) Nelson for Wisconsin on the advertisement discussed in the complaint in MUR. 7171 (d) Colleen Deacon for Congress on the advertisement discussed in the complaint in MUR 7172 (e) Applegate for Congress on the advertisement discussed in the complaint in MUR 7173 (f) Mowrer for Iowa on the advertisement discussed in the complaint in MUR 7174 (g) Texans for Pete on the advertisement discussed in the complaint in MUR 7175 (i) Shkreli for Congress on the advertisement discussed in the complaint in MUR. 7176 (j) Carroll for Colorado on the advertisement discussed in the complaint in MUR. 7177 (k) Eggman for Congress on the advertisement discussed in the complaint in MUR 7178 (I) Murphy for Congress on the advertisement discussed in the complaint in MUR 7179 (m) Bryan Caforio for Congress on the advertisement discussed in the complaint in MUR 7182 (n) Friends of Christina M. Hartman on the advertisement discussed in the complaint in MUR 7187 and (o) LuAnn Bennett for Congress on the advertisement discussed in the complaint in MUR 7188 (each a "Campaign" or "Advertisement" or collectively the "Campaigns" and "Advertisements," respectively). I took the lead at DCCC for managing this advertising program. I supervised this program and all DCCC staff working on these Advertisements. I was also in contact, directly or indirectly through my staff, with each of the Campaigns involved in these Advertisements.
  - 3. This program was conceived by DCCC without any request, suggestion, or assent by HFA or its agents. DCCC believed that the advertising program would be an effective way to promote our Democratic House candidates and the Democratic Party, given the intense opposition among Democratic voters to Donald Trump and the policies and positions he espoused.
  - 4. I managed every aspect of the creation, production, and dissemination process for each of these Advertisements, starting with script development through the advertising buying phase of each Advertisement. To that end, with a core group of DCCC staff, I worked directly with each Campaign and advertising vendor to draft each script and produce and edit each Advertisement.

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- 5. I instructed my staff working on the Advertisements and the staff of Campaigns involved with the Advertisements not to discuss any aspect of these Advertisements with HFA or its agents. Likewise, my staff and the Campaigns were instructed not to have any involvement with HFA or its agents with regard to these Advertisements. I am not aware of any breach of or deviation from this protocol.
- 6. To the best of my knowledge, and consistent with the instructions I gave, these Advertisements were developed internally at DCCC in coordination with each Campaign without any communication with or from Hillary for America or its agents. Likewise, to the best of my knowledge, none of the Advertisements were created, produced, or distributed at the suggestion or request of HFA or its agents nor did they assent to the creation, production, or distribution of any of the Advertisements.
- 7. In my work for DCCC on the Advertisements, to the best of my knowledge, neither I nor any DCCC employee or Campaign staff working on these Advertisements had any involvement with HFA or its agents regarding any Advertisement in any way, including, but not limited to:
  - i. the content of any Advertisement;
  - ii. the intended audience for any Advertisement;
  - iii. the means or mode of any Advertisement;
  - iv. the specific media outlet used for any Advertisement;
  - v. the timing or frequency of any Advertisement; or
  - vi. the duration of any Advertisements.
  - 8. In my work for DCCC on the Advertisements, to the best of my knowledge, neither I nor any DCCC employee or Campaign staff working on these Advertisements had discussions about with HFA or its agents about any Advertisement or HFA's plans, projects, activities, or needs with regard to any Advertisement. Neither HFA nor its agents conveyed to me, and to the best of my knowledge to any DCCC employee or Campaign staff working on these Advertisements, any relevant information about HFA's plans, projects, activities, or needs concerning any Advertisement.
  - 9. To the best of my knowledge, no DCCC employee or Campaign staff working on these Advertisements was employed by HFA at any time during the 120 days prior to the date that each Advertisement was aired.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 2/44 day of December, 2016.

Michael Jan Russell

## Exhibit B

#### lmage# 201612089039916605

## SCHEDULE F. (FEC Form 3X) ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY

POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

(To be used only by Political	FOR LINE 25 OF FORM 3X	
NAME OF COMMITTEE (In Full)		
DCCC .		
· · · · · · · · · · · · · · · · · · ·	Subordinate Committee	
coordinated expenditures by a political party committee?	2	
If YES, name the designating committee: Mailing Addr	958 430 South Capitol Street, SE	
Democratic National Committee &	2nd Floor	·
Pennsylvania Democratic Party  City Washington		State ZIP Codo: DC 20003-4024
Full Name (Lest, First, Middle Initial) of Each Payee	: Memo Item Purpose of E	
Mundy Katowitz Media, Inc	Media Se	rvices Category/
Mailing Address 1322 G Strout, SE	Date	· Type
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PAGE 109105 OF 109107

#### SCHEDULE F (FEC Form 3X)

TOTAL This Period (last page this line number only)......

## ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE PAGE 47529 OF 47535 FOR LINE 25 OF FORM 3X (To be used only by Political Committees in the General Election) NAME OF COMMITTEE (In Full) DCCC Full Name of Subordinate Committee Has your committee been dusignated to make coordinated expenditures by a political party committee? DCCC · x, YES . ] NO Mailing Address If YES, name the designating committee: 430 South Capitol Street, SE **Democratic National Committee &** 2nd Floor ZIP Code Michigan Democratic Party Washington 20003-4024 DC Full Name (Last, First, Middle Initial) of Each Payee : i Memo ilem Purpose of Expenditure Media Services Three Point Media, LLC Category/ Mailing Address 1000 Potomac Street, NW Date Suite 500 City Stato Zip Code **313**6 10 2016 Washington DC 20007 Nama of Federal Candidate Supported Office Sought: jx House State: Amount Driskell, Gretchen, , , Sonale 07 District: Presidential 1000,00 Aggregate General Election 96200.00 Expenditura for this Candidate Transaction ID: SF-951470 Full Name (Last, First, Middle Initial) of Each Payee Purpose of Expenditure : Memo Item Media Services Mundy Katowitz Media, Inc. Category/ Mailing Address 1322 G Street, SE Туро Date State Zip Code 13 2016 10 DC 20003 Name of Federal Candidate Supported Office Sought: X House State: Amount Senate Driskell, Grotchen. . . District: 07 Presidential 95200.00 Aggregate General Election 96200.00 Expenditure for this Candidate Transaction ID : SF-051459 Full Name (Last, First, Middle Initial) of Each Payes Ti Mama Itam Purposa of Expenditure Media Services Buying Time, LLC Calegory/ Mailing Address 650 Massachusetts Avenue, NW Туро Dato Suite 210 Zip Code City State 10 2016 17 Washington DÇ 20001 Name of Federal Candidate Supported Office Sought: x : House State: Mi Amount 08 Shkreli, Suzanna, . . Senate District: Presidential 52960.00 Aggregate General Election 52960.00 Expenditure for this Candidate > Transaction IO: SF-952064 149160.00 SUBTOTAL of Expenditures This Page (optional)......

Image# 201612209040802696

# SCHEDULE F (FEC Form 3X) ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) ON REHALE OF CANDIDATES FOR FEDERAL OFFICE

ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE					PAGE	109107 OF 109107		
(To be used only by Political Committees in the General Election)					FOR L	INE 25 OF FORM 3X		
	ME OF COMMITTEE (In Full)							
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	s your committee been designated to make				ordinate Committee			
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lf \	YES, name the designating committee:		Maili	ng Address	430 South Capitol S	Street, SE	<del></del>	
C	Democratic National Committe	е		_	2nd Floor			
			City	shington			State DC	21P Code 20003-4024
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#### SCHEDULE F (FEC Form 3X)

## ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

ON BEHALF OF CANDIDATES FOR FED	PAGE 47535 OF 4753	5		
(To be used only	eral Election) FOR LINE 25 OF FORM	3X		
NAME OF COMMITTEE (In Full)				
DCCC				
Has your committee been designated to make .	Full Name of Subordinate Committee		_	
coordinated expenditures by a political party committee?	DCCC		,	
X YES NO If YES, name the designating committee:	Malling Address 430 South Capitol 9	Street SE		
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	City	State ZIP Code		
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Full Name (Last, First, Middle Initial) of Each Payee	☐ Memo Item	Purpose of Expenditure Media Services	7	
Buying Time, LLC		Category		
Mailing Address 650 Massachusetts Avenue, NW		Туре		
Suite 210 City State	Zip Code	Date		
Washington	1 '	10 11 2016	- 1	
Name of Federal Candidate Supported Office Sough	t: 🗶 House   State: WI	Amount	_	
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	Presidential	32700.00	4	
Aggregate General Election  Expenditure for this Candidate	32700.00			
Transac	tion ID : SF-951664			
Full Name (Last, First, Middle Initial) of Each Payee	☐ Memo Item	Purpose of Expenditure Media Services	7	
Adelstein & Associates LLC	Category	<b>,</b>		
Mailing Address 222 West Ontario Street, Suite	Туре	<u>"                                    </u>		
City	Zip Code	Date		
City State Chicago	60654	10 13 2016		
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	Presidential	48100.00	_  [_	
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# SCHEDULE F (FEC Form 3X) ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) ON REHALE OF CANDIDATES FOR FEDERAL OFFICE

TOTAL This Period (last page this line number only)......

ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE PAGE 63515 OF 63518 FOR LINE 25 OF FORM 3X (To be used only by Political Committees in the General Election) NAME OF COMMITTEE (In Full) DCCC Full Name of Subordinate Committee Has your committee been designated to make coordinated expenditures by a political party committee? DCCC ¥ YES NO If YES, name the designating committee: Mailing Address 430 South Capitol Street, SE 2nd Floor **Democratic National Committee &** ZIP Code California Democratic Party Washington 20003-4024 Full Name (Last, First, Middle Initial) of Each Payee Memo Item Purpose of Expenditure Media Services The New Media Firm, Inc. Category/ Mailing Address 1730 Rhode Island Ave., NW Type Date Suite 213 Zip Code City State "09 20 Î 2016 Washington DC 20036 Name of Federal Candidate Supported Office Sought: House State: CA Amount 49 Applegate, Doug, Loren, , District: 91200.00 : Presidential Aggregate General Election 91200.00 Expenditure for this Candidate Transaction ID: \$F-949904 Full Name (Last, First, Middle Initial) of Each Payee Purpose of Expenditure Memo Item Media Services Screen Strategies Media, LLC Category/ Type Mailing Address 11150 Fairfax Blvd Date Suite 505 City State Zio Code 23 2016 VA 22030 Name of Federal Candidate Supported Office Sought: \* House State: CA Amount District: Senate 25 Caforio, Bryan. . . 46490.00 Presidential Aggregate General Election 96200.00 Expenditure for this Candidate Transaction ID: SF-950014 Full Name (Lest, First, Middle Initial) of Each Payee Purpose of Expenditure . Meino liem Media Services Screen Strategies Media, LLC Category/ Type: Mailing Address 11150 Fairfax Blvd Date Suite 505 Zip Code State City 09 26 2016 22030 Name of Federal Candidate Supported Office Sought: ★ House State: CA Amount 25 District: Catorio, Bryan. . . Senate Presidential 13431.04 Aggregate General Election 96200.00 Expenditure for this Candidate Transaction ID : SF-950737 151121.04 SUBTOTAL or Expenditures This Page (optional).......

## Exhibit C

## BEFORE THE FEDERAL ELECTION COMMISSION

#### **DECLARATION OF MAURA JOHNSON - MUR 7179**

- I, Maura Johnson, do declare and state as follows:
  - During the 2016 election, as a Mcdia Supervisor at GMMB, Inc. ("GMMB"), I provided
    media buying services for Ralston Lapp Media, the consultant working with Stephanie
    Murphy for Congress. Through that position, I am familiar with the matters discussed
    herein.
  - 2. During that time, I worked with DCCC and Stephanie Murphy for Congress to distribute an advertisement discussed in the complaint in FEC Matter Under Review 7179 (the "Advertisement"). To the best of my knowledge and belief, I was the only employee of GMMB that worked on the Advertisement.
  - 3. GMMB worked for Hillary for America ("HFA") during the 2016 election cycle.
  - 4. To the best of my knowledge, the Advertisement was not created, produced, or distributed at the suggestion or request of HFA or its agents and HFA or its agents did not assent to the creation, production, or distribution of the Advertisement.
  - 5. To the best of my knowledge, neither I, nor any employee or agent of GMMB working on the Advertisement, had any involvement with HFA or its agents regarding the Advertisement in any way, including, but not limited to:

MJ 12/21/16

- i. the content of the Advertisement;
- ii. the intended audience for the Advertisement;
- iii. the means or mode of the Advertisement;
- iv. the specific media outlet used for the Advertisement;
- v. the timing or frequency of the Advertisement; or
- vi. the duration of the Advertisement.
- 6. To the best of my knowledge, neither I, nor any employee or agent of GMMB working on the Advertisement, had discussions with HFA or its agents about the Advertisement.
- 7. To the best of my knowledge, neither I, nor any employee or agent of GMMB in working on the Advertisement, used or conveyed information about HFA's campaign plans, projects, activities, or needs to create, produce, or distribute the Advertisement.
- 8. To the best of my knowledge, neither I, nor any employee or agent of GMMB in working on the Advertisement, used information previously used by GMMB in providing services to HFA in relation to the distribution of the Advertisement.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this <u>31</u> day of December, 2016.

Maura Johnson

#### **BEFORE THE**

#### FEDERAL ELECTION COMMISSION

#### DECLARATION OF DAVID DIXON AND RICHARD DAVIS, DIXON/DAVIS MEDIA GROUP LLC - MUR 7188

David Dixon and Richard Davis do declare and state as follows:

- During the 2016 election, we were partners at the Dixon/Davis Media Group LLC
   ("Dixon/Davis"). Through that position, we are familiar with the matters discussed
   herein.
- At the request of DCCC, and with the guidance of DCCC and their legal counsel,
   Dixon/Davis worked with DCCC and LuAnn Bennett for Congress to create, produce,
   and distribute an advertisement discussed in the complaint in FEC Matter Under Review
   7188 (the "Advertisement").
- 3. Dixon/Davis worked for Hillary for America ("HFA") during the 2016 election cycle.
- 4. To the best of our knowledge, the Advertisement was not created, produced, or distributed at the suggestion or request of HFA or its agents and HFA or its agents did not assent to the creation, production, or distribution of the Advertisement.
- 5. To the best of our knowledge, no employee or agent of Dixon/Davis working on the Advertisement had any involvement with HFA or its agents regarding the Advertisement in any way, including, but not limited to:
  - i. the content of the Advertisement;

- ii. the intended audience for the Advertisement;
- iii. the means or mode of the Advertisement;
- iv. the specific media outlet used for the Advertisement;
- v. the timing or frequency of the Advertisement; or
- vi. the duration of the Advertisement.
- 6. To the best of our knowledge, no employee or agent of Dixon/Davis working on the Advertisement had discussions with HFA or its agents about the Advertisement.
- 7. To the best of our knowledge, no employee or agent of Dixon/Davis in working on the Advertisement used or conveyed information about HFA's campaign plans, projects, activities, or needs to create, produce, or distribute the Advertisement.
- 8. To the best of our knowledge, no employee or agent of Dixon/Davis in working on the Advertisement used information previously used by Dixon/Davis in providing services to HFA in relation to the creation, production, or distribution of the Advertisement.

We declare under penalty of perjury that the foregoing is true and correct. Executed on this Zerry day of December, 2016.

David Dixor

Richard D

### **Exhibit D**

24/48 HOUR REPORT OF INDEPENDENT (Schedule E)	EXPEND	ITURES		PAGE 9 OF 9
				FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC				FEC IDENTIFICATION NUMBER ▼
		_		C c00000935
Check if 24-hour report 48-hour report	New repo	ort Amends repo	ort filed on	
Full Name of Payee Old Towne Media			Di	ate of Public Distribution/Dissomination
Date of Dissemination: 10 Mailing Address 4507 Pénwood Dr	/19/16	<del></del>		10 19 2016
Valuing Address 2507 Penwood Dr			Aı	nount
Cliy	State	Zíp Code	}`	48000.00
Alexandria	VA	22310		ansaction ID : SE-952383 atc of Disbursement or Obligation
Purpose of Expenditure Media Buy		Catogory/ 004		10 18 2016
Name of Federal Candidate		Support	Office So	ught: House District: 00
Donald J. Trump		Oppose	X Pro	sidont Senate Stato:
Calendar Year-To-Dute Per Election for Office Sought		42321.20	2016	nent For: ☐ Primary ☐ General
Full Name of Payee				ate of Public Distribution/Dissemination
AL Media, LLC			~	10 19 2016
Date of Dissemination: 10.  Mailing Address 222 West Ontario Wost	/19/16			10 19 2016
222 11001 0110110 11001			Ar	nount
Sulte 600	State	Zip Code	,	81321.00
Chicago	IL	60654 ·	Tra	nsaction ID : SE-952887 ate of Disbursement or Obligation
Purpose of Expenditure Media Buy		Calegory/ 004		10 14 2016
Name of Federal Candidate		Support	Office Sc	ught: House District: 00
Donald J. Trump		Oppose	X Pre	sident Senate State:
Calendar Year-To-Date Per Election for Office Sought	د او د سوادیوه د او د سوادیوه	2742321.20	2016	nent For: Primary General Other (specify)
			اسبم	9 19 19 ay ya deganang sayayangga ayan aya. Is
(a) SUBTOTAL of Itemized Independent Expenditures			<b>•</b> ].	129321.00
(b) SUBTOTAL of Unitemized independent Expenditure	···		<b>&gt;</b> {	ng ing kanangan yang pangangan ang pangangan ang pangangan ang pangangan ang pangangan ang pangangan ang pangan
(c) TOTAL Independent Expenditures		***************************************	<b>&gt;</b> ;	273146.39
Under penalty of perjury I cortily that the independent with, or at the request or suggestion of, any candidate party committee) any political party committee or its ag	or authorized	reported horein were committee or agent of	nol made if either, or	in cooperation, consultation, or concert (If the reporting entity is not a political
Kelly C. Ward	•		1 4 20.	21 2016
Signature		Date	; 10 ·	, 21 1 2016 1

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	:S
(Schedule E)	PAGE 48 OF 60 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER ▼
DCCC	C, c00000935
Check if 24-hour report 48-hour report New report	Amends report filed on
Full Name of Payee	Date of Public Distribution/Dissemination
Screen Strategies Media, LLC Date of Dissemination: 10/24/16	10   24   2016
Mailing Address 11150 Fairfax Blvd	Amount
Suite 505	Aguonti
City State Zip Code	de 45000.00
Fairfax VA 22030	Transaction ID : SE-952072 Date of Disbursement or Ohlgallon
Purpose of Expenditure Media Buy  Categor Ty	ory/ ype 004 10 17 2016
Name of Federal Candidate	Support Office Sought:   House District: 00
Donald J. Trump	Oppose President Senate State:
Calendar Year-To-Date	Disbursement For: Primary X General
Per Election for Office Sought 3653174.61	
Full Name of Payee AL Media LLC	Date of Public Distribution/Dissemination
Date of Dissemination: 10/24/16	10 24 2016
Mailing Address 222 W Ontario St	Amount
Suite 600	
City State Zip Code	المتعارف المستلف المتعارف من المتعارف ا
Chicago IL 60654	Transaction ID : SE-953187 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy  Categor Ty	orW 904 10 121 2016
Name of Federal Candidate	Support Office Sought: House District: 00
Donald J. Trump	Oppose   President   Sonate State:
Calendar Year-To-Date	· Disbursement For: Primary General
Per Election for Office Sought	Other (specify)
(a) SUBTOTAL of Itemized Independent Expenditures	176250.00
(8) 300 ופות שליים וואופיים וואיים ו	
(b) SUBTOTAL of Unitemized Independent Expenditures	
	أوسن المستحمد معاديات والمامدين الم
(c) TOTAL Independent Expenditures	A star man and the star of the
Under penalty of perjury I certify that the independent expenditures reported with, or at the request or suggestion of, any candidate or authorized committee party committee) any political party committee or its agent.	I herein were not made in cooperation, consultation, or concert tee or agent of either, or (if the reporting entity is not a political
Kelly C. Wurd	near in a stand date
Signature	Date 10 25 2016

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	PAGE 51 OF 60
(Schedule E)	PAGE 51 OF 60 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER *
DCCC	C 600000935
Check If 24-hour report 48-hour report New report Amends report files	d on [ " - " 1   0.2.0 ] , [
Full Name of Payee AL Media LLC	Date of Public Distribution/Dissemination
Date of Dissemination: 10/25/16  Mailing Address 222 W Ontario St	25 2016
Suite 600	Amouni
City State Zip Code	9000.00
Chicago IL 60654	Transaction ID: SE-953228  Date of Disbursement or Obligation
Purpose of Expenditure Modia Buy  Category/ Type  O04	10 24 2016
Name of Federal Candidate [7] Support Office	e Sought: House District: 00
Donald J. Trump Oppose	President Senate State:
Calendar Year-To-Date Per Election for Office Sought  Diab 2016	ursemont For: ☐ Primary ※ General
Full Name of Payee Canal Partners Media, LLC Date of Dissemination: 10/25/16  Meiling Address 25 Whitlock Place	Date of Public Distribution/Dissemination
Suite 200	Amount
City State Zip Code	184082.00 Transaction ID : SE-952497
Marietta GA 30064	Date of Disbursement or Obligation
Purpose of Expenditure Media Buy  Category/ Type  Category/ Type	10 18 2016
Name of Federal Candidate   Support Office	a Sought: House District: 00
Oppose Oppose	President Senato State:
Calendar Year-To-Date Por Election for Office Sought  Calendar Year-To-Date Por Election for Office Sought  A369947.93  Disb	ursement For: Primary X General
(a) SUBTOTAL of Itemized Independent Expenditures	193082.00
(b) SUSTOTAL of Uniternized Independent Expenditures	The second secon
•	To the last of the parameter of the last o
(c) TOTAL Independent Expenditures	A . a the above to a
Under penalty of perjury I certify that the independent expenditures reported herein were not me with, or at the request or suggestion of, any candidate or authorized committee or agent of either party committee) any political party committee or its agent.	ade in cooperation, consultation, or concert er, or (if the reporting entity is not a political
Kelly C. Hard Date Signature	10 1 25 2016

24/48 HOUR REPORT OF INDEPENDENT EXPENDENT	DITURES	
(Schedule E)		PAGE 23 OF 23 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)		FEC IDENTIFICATION NUMBER Y
DCCC		> mile si malangangangangangangangan
		C c00000935
Check if 24-hour report 48-hour report New re	part [] Amends repo	ort filed on
Full Name of Payee		Date of Public Distribution/Dissemination
Moore Campaigns, LLC		10 28 2016
Mailing Address 447 Irving St. NW		Amount
	<del></del>	والارمة ومنوا المعاريت والعادا
City	Zip Codo	4472.36
Washington DC	20010	Transaction ID : SE-954234  Date of Disbursement or Obligation
Purpose of Expenditure Mail Services	Category/ 000 Typo 000	[ 10 ] [ 27 ] 2016
Name of Federal Candidato	Support	Office Sought: House District: 00
Donald J. Trump	Oppose	President Senate State:
Calendar Year-To-Date	en in the contract of	Disbursament For: Primary General
Per Election for Office Sought	593586.81	2016 Other (specify) >
Full Name of Payee		Date of Public Distribution/Dissemination
AL Media LLC		10   28   2016
Mailing Address 222 W Ontario St		10 28 2016
ZZZ W OMANO OL		Amount
Suito 600 Cfty State	Zip Code	30525.00
Chicago IL	60654	Transaction ID : SE-953928  Date of Disbursement or Obligation
Purpose of Expenditure	Category/ Con	Landard Deman   Landardardard
Media Buy	Type 004	10 26 2016
Name of Federal Candidate	Support	Office Sought: House District:00
Donald J. Trump	Oppose	President Senate State:
Calendar Year-To-Date		Disbursement For: Primary General
Per Election for Office Sought	4593586.81	2016 Other (specify) ▶
(a) SUBTOTAL of Itamized Independent Expenditures		34997.36
		facts of a second a second a second as
(b) SUBTOTAL of Unitemized Independent Expenditures	.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	•
·		The state of the s
(c) TOTAL Independent Expenditures	***************************************	1588863.18
Under pentity of perjury I contily that the independent expenditures with, or at the request or suggestion of, any candidate or authorized party committee) any political party committee or its agent.	s reported herein were r d committee or agent of	not made in conperation, consultation, or concert either, or (if the reporting entity is not a political
Kelly C. Ward		gā Turn kirmin mā kiprnir santinā
الماحد المعطومية والموارد المراجع المعارض المع	Date	10 29 2016
Signature		h h d pala

## lmage# 201610319037014651 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)

chedule E)	PAGE 7 OF 8 FOR SE OF FORM 24/48
AME OF COMMITTEE (In Full)	DENTIFICATION NUMBER V
JCCC	C00000935
	אבידיין און אידיין
heck if X 24-hour report 48-hour report New report Amends report filed on	
Full Name of Payee Adelstein & Associates LLC	c Distribution/Dissemination
Date of Dissemination: 10/31/16	31 2016
Mailing Address 222 West Ontario Street, Suite 600 Amount	
City State Zip Code	80000.00
	ID : SE-954371 ursement or Obligation
Purpose of Expenditure  Media Buy  Category/ Type  004  10	28 2016
Name of Federal Candidate Support Office Sought:	House District: 00
Trump, Donald, J., ,	Senate State:
Calendar Year-To-Date Per Election for Office Sought  4978620.65  Disbursement For: 2016  Other (sp	Primary   General  Decify) ▶
Full Name of Payee Date of Publi	ic Distribution/Dissemination
Adelstein & Associates LLC Date of Dissemination: 10/31/16	31 2016
Malling Address 222 West Ontario Street, Suite 600 Amount	
City State Zip Code	67387.50
	D : SE-954372 ursement or Obligation
Purpose of Expenditure Media Buy  Category/ Typo  10	28 2016
Name of Federal Candidate Support Office Sought:	House District: 00
Trump, Donald, J., ,	Senate State:
Calendar Year-To-Date Per Election for Office Sought  Disbursement For: 2016  Other (st	Primary   General  pecify)   ■
(a) CHRIOTAL of Incrined Independent Expenditures	447707.50
(a) SUBTOTAL of Itemized Independent Expenditures	147387.50
(b) SUBTOTAL of Unitemized Independent Expenditures	Allendar Desident
(c) TOTAL Independent Expenditures	471
Under penalty of perjury I certify that the independent expenditures reported herein were not made in coopera with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the rep party committee) any political party committee or its agent.	alion, consultation, or concert forting entity is not a political
Ward, Kelly, C [Electronically Filed] Date 10 31	2016
Signature	

4/48 HOUR REPORT OF INDEPE ichedule E)	NDENT EXPEN	IDITURES	PAGE 51 OF 52
AME OF COMMITTEE (In Full)			FOR SE OF FORM 24/48
			FEC IDENTIFICATION NUMBER ▼
	<u></u>		C C00000935
heck if 24-hour report X 48-hour rep	port New	report Amends rep	ort filed on
Screen Strategies Media, LLC	) inalion: 10/18/16		Date of Public Distribution/Dissemination
Malling Address 11150 Fairfex Blvd			
Suite 505			. Amount
City	State	Zip Code	134898.50
Fairfax	VA	22030	Transaction ID : SE-952377 Date of Disbursement or Obligation
Purpose of Expanditure Madla Buy	·	Category/ Type 004	
Name of Federal Candidate		Support	Office Sought: House District: 00
Donald J. Trump		🔀 Оррозе	X President Senate State:
Calendar Year-To-Date Per Election for Office Sought	,	2613000.20	Disbursement For: Primary ★ General 2016
Full Name of Payee			: Date of Public Ulstribution/Dissemination
Kully Hall, LLC			
Date of Dissemi	ination: 10/18/16		10 18 2016
Mailing Address 1932 1st Ave. Suite 203	•		Amouni
City	State	Zip Code	6225.00
Scattle	WA	98101 -	Transaction ID : SE-952379 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Media Production		Category/ Type	10 18 2016
Name of Foderal Candidate	<del></del>	Support	Office Sought: House District: 00
Donald J. Trump		X. Oppose	President Scrate State:
Calendar Year-To-Date Per Election for Office Sought	•	2613000.20	Disbursement For: Primary X General
	1 1		Other (specify) ▶
(a) SUBTOTAL of Itemized Independent Exp (b) SUBTOTAL of Unitemized Independent			,
(c) TOTAL Independent Expenditures			•
Under penalty of perjury I certify that the in with, or at the request or suggestion of, any party committee) any political party committee.	candidate or authorit	res reported herein were zed committee or agent o	not made in eqoperation, consultation, or concert of either, or (if the reporting entity is not a political
Kelly C. Ward		_	V N A C 2000
Signature	·	Date	10 19 2016
Signature			

24/48 HOUR REPORT OF INDEPENDE (Schedule E)	NT EXPE	NDITURES		PAGE 48 OF 60 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)		<del></del>	LEEC	IDENTIFICATION NUMBER ▼
DCCC	•		C	C00000935
Check if 24-hour report	X New	raport : Amends rep	ort filed on	0 P * * Y Y
Full Name of Payee Screen Strategies Media, LLC Date of Dissemination:	10/24/16	•	Date of Pub	lic Distribution/Dissemination
Mailing Address 11150 Fairfax Blvd	10/24/10		Amount	24 2016
Suito 505				
City .	Slate	Zip Code		45000.00
Fairfax	VA	22030		ID : SE-952072 pursement or Obligation
Purpose of Expenditure Media Buy		Calegory/ Type 004	"10"	17 2016
Name of Federal Candidate		Support	Office Sought:	House District: 00
Donald J. Trump		<b>Х</b> Орроѕе	Xi President	Senate State:
Calendar Year-To-Date Per Election for Office Sought	,	3653174 61	Disbursement For:	Primary General
	<del></del>	·		peally) 🕨
Full Name of Payee  AL Media LLC  Date of Dissemination:	10/24/16			lic Distribution/Dissemination
Mailing Address 222 W Onlario St				24 2010
Suite 600			Amount	
City	State	Zip Code		131250.00
Chicago	u	60654		D: SE-953187 Dursement or Obligation
Purpose of Expenditure Media Buy		Category/ 004	10"	21 2016
Name of Federal Candidate		Support	Olfice Soughi:	House District: 00
Donald J. Trump		X Oppose	X President	Senale State:
Calendar Year-To-Date Per Election for Office Sought	3	3653174.81	Disbursement For: 2016 Cther (s	
(a) SUBTOTAL of Iternized Independent Expenditus (b) SUBTOTAL of Uniternized Independent Expend			•	176250.00
(c) TOTAL Independent Expanditures			►	. ,
Under penalty of perjury I certify that the independ with, or at the request or suggestion of, any candid party committee) any political party committee or its	ale or author	ues reported herein were łzed committee or agent o	not made in coopera of either, or (if the rep	ulion, consultation, or concert worting entity is not a political
Relie C. World	•	_	, u 1 °	7 y ÿ /
Signature .		Onte	10 25	2016

448 HOUR REPORT OF INDEPE	NDENT EXPEN	IDITURES		[0:05 05
chedule E)				PAGE 52 OF 60 FOR SE OF FORM 24/48
AME.OF COMMITTEE (In Full)			FEC I	DENTIFICATION NUMBER Y
occc			C	C00000935
	:			
eck if 24-hour report 48-hour re	port X New	report Amenda rep	ort filed on	0 E
Full Name of Payes				ic Distribution/Dissemination
	ination: 10/25/16		10	25 2018
Mailing Addross 11150 Fairfax Blvd			Amount	
Suite 505				
City	Slate	Zip Code	,	64326.00
Fairlax	VA	22030		ID : SE-953184 ursement or Obligation
Purpose of Expanditure Media Buy		Category/ Type 004	10	21 2016
Name of Federal Condidate		Support	Office Sought:	House District: 00
Donald J. Trump		X Oppose	President	Senate State:
Calendar Year-To-Date			Disbursement For:	
Per Election for Office Sought		4369947.93	2016 Other (sp	
Full Name of Payee		·		c Distribution/Dissemination
Buying Time, LLC			Dale of Publ	
	ination: 10/25/16		10	25 2016
Mailing Address 650 Massachusells Ave	nue, NW		Amount	
City	State	Zip Code		62488.00
Washington	DC	20001		D : SE-953185 ursement or Obligation
Purpose of Expenditure Media Buy	•	Category/ Type 004		_
Name of Federal Gandidate		Support	Office Sought:	House District: 00
Donald J. Trump		X Oppose		Senate State:
Calendar Year-To-Date			Disbursement For:	
Per Election for Office Sought	ż	4369947.93	2016 Other (sp	
<del> </del>			(2)	
(a) SUBTOTAL of Itemized Independent Ex	penditures		··· <b>b</b>	126814.00
	,		,	•
(b) SUBTOTAL of Uniternized Independent	Expenditures		··· <b>b</b>	
			,	•
(c) TOTAL Independent Expenditures	·	4	··· <b>&gt;</b> ,	,
Under penalty of perjury ! certify that the in with, or at the request or suggestion of, any party committee) any political party committee.	candidate or authoriz	es reported herein were red committee or agent	not made in coopera of either, or (if the rop	tion, consultation, or concert orting entity is not a political
Kelly G. Ward				, , , ,
Signature	ا بالمسلم	Oat	e 10 25	2016
0.3.19.016				

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)	PAGE 8 OF 8
NAME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER ▼  C C00000935
Check if X 24-hour report 48-hour report X New report Amends report filed	J a a t v . s
Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 10/31/16	Date of Public Distribution/Dissemination
Mailing Address 11150 Fairfax Blvd	A
Sulte 505	Amount
City State Zip Code	55000,00
Fairfax VA 22030	Transaction ID : SE-953293 Date of Dishusement or Obligation
Purpose of Expenditure  Media Buy  Category/ Type  004	10 25 2016
Name of Federal Candidate Support Office	e Sought: 1 House District: 00
	President : Senate State:
Colonda Van To Dala	ursement For Primary X General
To be bounded on the control of the	Other (specify)
Full Name of Payee AL Media LLC Date of Dissemination: 10/31/16	Date of Public Distribution/Dissemination
Mailing Address 222 W Ontario SI Suite 600	- Amount
City State Zip Code	115875.00
Chicago IL 60654	Transaction ID : SE-954178 Date of Disbursement or Obligation
Purpose of Expenditure  Media Buy  Category/ Type  004	10" 27" 2016"
Name of Federal Candidate Support Offic	e Sought: House District: 00
	President Sonate State:
Calendar Year To Date Per Election for Office Sought 4979620.65	oursement For: Primary General  Other (specify)
(a) SUBTOTAL of Itemized Independent Expenditures	, 170875.00
(b) SUBTOTAL of Uniterrized Independent Expenditures	
(c) TOTAL Independent Expenditures	433711.75
Under penalty of parjury I certify that the independent expenditures reported herein were not me with, or at the request or suggestion of, any candidate or authorized committee or agent of eithe party committee) any political party committee or its agent.	ade in cooperation, consultation, or concert er, or (if the reporting entity is not a political
Kelly C. Ward  Date 1 Signature	10 31 2016

	9ge# 201611049037121060 /48 HOUR REPORT OF INDEP	'ENDENT EXPEN	DITURES				
	chedule E)		• • • • • • • • • • • • • • • • • • • •		PAGE 10 OF 11		
ΝA	ME OF COMMITTEE (In Full)				FOR SE OF FORM 24/48		
	OCCC				FEC IDENTIFICATION NUMBER ▼		
					C C00000935		
Ch	eck If 🗷 24-hour report 🔲 48-hour r	report 🔊 🗷 New re	report Amends repo	ort filed	on while the state of the state		
	Full Name of Payee Screen Strategies Media, LL Date of Dissel	LC emination: 11/04/16			Date of Public Distribution/Dissemination		
	Malling Address 11150 Fairfax Blvd				Amount		
	Suite 505				Sunsitional transferration of the Sunsition of Sunsition of Sunsition of Sunsition of Sunsition of Sunsition		
	City Fairfax	State VA	Zip Code 22030		Transaction ID: SE-954176		
	Purpose of Expenditure Media Buy	<u></u>	Category/ 004		Date of Disbursement or Obligation		
	Name of Federal Candidate		Support	Office	Sought: House District: 00		
	Trump, Donald, J., ,		× Oppose	I	President Senate State:		
	Calendar Year-To-Date Per Election for Office Sought	The state of the state of	6419383.70	Disbu 2016	rsement For: Primary X General  Other (specify) ▶		
	Full Name of Payee				Date of Public Distribution/Dissemination		
	AL Media LLC	emination: 11/04/16		}	11 04 2016		
	Mailing Address 222 W Ontario St				استخصفت استفسا		
	Suite 600			ļ	Amount		
	City	State	Zip Code		3750.00		
	Chicago	IL	60654		Transaction ID : SE-954988 Date of Disbursement or Obligation		
	Purpose of Expenditure Media Buy		Category/ 004		11 04 2016		
	Name of Federal Candidate Trump, Donald, J., ,		Support  K Oppose	1	e Sought: House District: 00  President Senate State:		
	Calendar Year-To-Date Per Election for Office Sought		6419383.70	Disbu 2016	ursement For: Primary X General Other (specify) >		
	(a) SUBTOTAL of Itemized Independent I	Expenditures		···· <b>&gt;</b>	43750.00		
	(b) SUBTOTAL of Unitomized Independen	nt Expenditures	,	··· >	and on the line bearing the short bearing		
 	(c) TOTAL Independent Expenditures			··· <b>&gt;</b>	and the desired and the desire		
ļ ·	Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.						
	Ward. Kelly, C., .	<i>l'Electi</i>	ronically Filed] Dale	ru 7	1 04 2016		
ĺ	Signature	, and the same of	Dall	* L.:	hadred hadrand		

	Image# 201611049037121059 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES							
	chedule E)		1011 01120		PAGE 9 OF 11			
NA	ME OF COMMITTEE (In Full)	<del></del>			FOR SE OF FORM 24/48			
	CCC				FEC IDENTIFICATION NUMBER ▼			
	C c00000935							
Che	eck if X 24-hour report 48-hour repo	ort 🗼 🗶 New r	report Amends repo	ort filed	on [ and , [ area , [ array]			
	Full Name of Payee Screen Strategies Media, LLC Date of Dissemine	eation: 11/04/16			Date of Public Distribution/Dissemination			
ľ	Mailing Address 11150 Fairfax Blvd	2,000			interior interior			
	Suite 505			]	Amount			
İ	City .	State	Zip Code		13000.00			
ı	Fairfax	VA	22030		Transaction ID : SE-954882			
ŀ	Purpose of Expenditure		Category/		Date of Disbursement or Obligation			
}	Media Buy		Type 004	_	11 03 2016			
Ì	Name of Foderal Candidate		Support	Office	e Sought: House District: 00			
	Trump, Donald, J., ,		✓ Oppose	Í	President Senate State:			
ŀ				<del> </del>	ursement For: Primary X General			
	Calendar Year-To-Date Per Election for Office Sought	Annihoul Virolamband)	6419383.70	2016				
Ī	Full Name of Payee				Date of Public Distribution/Dissemination			
Ì	The New Media Firm, Inc. Date of Dissemina	nation: 11/04/16			11 04 2016			
ľ	Mailing Address 1730 Rhode Island Ave., N				Instruct Instructional			
1	Suite 213				Amount			
Ì	City	Stale	Zip Code		46000.00			
	Washington	DC	20036		Transaction ID : SE-954883  Date of Disbursement or Obligation			
	Purpose of Expenditure Media Buy		Calegory/ Type 004		11 03 2016			
1	Name of Federal Candidate		Support	Offic	e Sought: House District: 00			
l	Trump, Donald, J., ,		X Oppose	×	President Senate State:			
Ī	Calendar Year-To-Date	<del></del>			pursement For: Primary X General			
	Per Election for Office Sought	استوميل المستويدات	6419383.70	2016	Other (specify)			
(	(a) SUBTOTAL of Itemized Independent Expe	andliures		·· Þ	59000.00			
(	(b) SUBTOTAL of Uniternized Independent Ex	xpenditures	***************************************	·· <b>&gt;</b>				
(	(c) TOTAL Independent Expenditures			·· <b>&gt;</b>				
v	Under penalty of perjury I certify that the indowith, or at the request or suggestion of, any coarty committee) any political party committee	candidate or authoriz	res reported herein were zed committee or agent c	not m	ade in cooperation, consultation, or concert ir, or (if the reporting entity is not a political			
	Ward, Kelly. C., .	/Elect	tronically Filed] Date	_ ["i	יייטין, ויייטין, ווייטיטין, ווייטיטין, ווייטיטין, ווייטיטין, ווייטיטין, ווייטיטין, ווייטיטין, ווייטיטין, ווייטי			
	Signature			'ــا	deal hadred brokensame and			

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### SCHEDULE E (FEC Form 3X) IT

EMIZED INDEPENDENT EXPENDITURES					DAGE 100	024 OF 109107
						24 OF FORM 3X
AME OF COMMITTEE (In Full)				FEC	<del></del>	ION NUMBER V
OCCC				c	C0000093	5 <sub>.</sub>
neck if 24-hour report . 48-hour report	New rep	Oil Amends repo	ort Jilad	on		
Full Name of Payee Screen Strategies Media, LLC		. Memo	ltam	Date of Pub	ic Distribulion	n/Dissemination
Date of Dissemination: 11/07/16 - 24 hours prior to	election day		<del></del>	11	07.	2016
Mailing Address 11150 Fairfax Blvd				Antoutt		
Suite 505		·				
City	State	Zip Code		<b>V</b>		38173.50
Fairfax	VA .	22030			ID : SE-9546 ursement or	
Purpose of Expenditure Media Buy		Category/ Type 004		11	01	2618
Name of Federal Candidate:		Support	Office	e Sought:	House	District:
Trump, Donald, J.,		× Oppose	×	P:esident	Senate	Slate:
Calendar Year To-Date		· · · · · · · · · · · · · · · · · · ·	Dish	irsement For:	Primar	y × Ganeral
Per Election for Office Sought		6693372.69	2018	Other (s	pecify) 🕨	
Full Name of Payee The New Media Firm, Inc. Date of Dissemination: 11/01/15		Memo	ltern	Oare of Publ	ic Distribution	VDissemination
Mailing Address		<del></del>		••	•	2010
1730 Rhode Island Ave NW Suite 213			. '	Amount		
City	State	Zip Code	_			3566.00
Washington	DC	20038			ID : SE-954	
Purpose of Expanditure Media Production		Category/ Type 004		11	01 <sup>4</sup>	2016
Name of Federal Candidate:	<del></del>	Support	Office	e Sought:	House	District:
Trump, Donald, J., ,		x Oppose	· "×	President	Senate	State:
Calendar Year-To-Date Per Election for Office Sought		6693372.69	Disbu 2016	ursement For:		y ≭ General
(a) SUBTOTAL of Itemized Independent Expenditures						41739.50
			•	٠		
(a) SUBTOTAL of Uniternized Independent Expenditue			٠			
(a) TOTAL Independent Expenditures			<b>&gt;</b>			•
Under penalty of perjury I certify that the independe with, or at the request or suggestion of, any candida party committee) any political party committee or its	ate or authorized	reported herein were committee or agent (	noi m	ade in cooper ar, or (if the re	ation, consult porting entity	ation, or cuncerl is not a publical
Word, Kelly, C.,	Electronically Fit			n 00	ac	)16
Signature	,	Date Date	, 1	2 08	20	,

24/48 HOUR REPORT OF INDE	PENDENT EXPEN	DITURES		PAGE 51 OF 52
Schedule E)				PAGE 51 OF 52 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)		<del></del>	FEC	IDENTIFICATION NUMBER V
DCCC	•		. С	C00000935
Check if 24-hour report X 48-hour	r repart New re	port () Amends rep	ort filed on	
Full Name of Payer Screen Strategies Media, I Date of Diss	 _LC:			lic Distribution/Dissemination
	emination: 10/18/16		10"	18 2016
Malling Address 11150 Fairfax Blvd			Amouni	
Suite 505				
City	State	Zio Code		134898.50
Fairlex	VA	22030		IO.: SE-952377 oursament or Obligation
Purpose of Expenditure Media Buy		Category/ Type 004	יי ע 10	11 2016
Name of Federal Candidate		Support	Office Sought:	House District: 00
Donald J. Trump		X Oppose	X President	Senale State:
Cala de Mara To Data				Primary X General
Calendar Year-To-Date Per Election for Office Sought		2613000.20	2016 Other (s	• • • •
5 8 8 8 9 9 9 9	,			
Full Name of Payee Kully Hall, LLC				lic Distribution/Dissemination
Oate of Diss	semination: 10/18/16		10	18 2016
Mailing Address 1932 1st Ave, Suite	203		Amouni	
City	State	Zip Code		6225.00
Scattle	WA	98101	Transaction	D : SE-952379 pursement or Obligation
Purpose of Expenditure Media Buy Media Production	Approximately and the second of the second o	Category/ Type		18 2016
Name of Federal Candidate			Office Sought:	House District: 00
Donald J. Trump		X. Oppose		Senate State:
	·			
Calendar Year-To-Date Per Election for Office Sought	. , , ,	2613000.20	Olsbursement For: 2016 Other (s	12.2
(a) SUBTOTAL of Ilemized Independent	Expenditures			141123.50
•			•	•
(b) SUBTOTAL of Unitermized Independ	ent Expenditures		<b>)</b>	
			•	•
(c) TOTAL Independent Expenditures	, , , , , , , , , , , , , , , , , , ,	***************************************	" ▶ ,	•
Under penalty of perjury I certify that the with, or at the request or suggestion of, party committee) any political party com-	any candidate or authorize	s reported herein were ed committee or agent	not made in coopera of elthor, or (if the rep	ition, consultation, or concert porting entity is not a political
Kelly C. Ward			9 P :	4 - 5 - 4
a transporter major unter upung , ab to		Date		2016
Signature				

24/48 HOUR REPORT OF INDER (Schedule E)	'ENDENT EXPENDI	ITURES	PAGE 3 OF 3
NAME OF COMMITTEE (In Full)			FOR SE OF FORM 24/48
DCCC			C C00000935
Check If 24-hour report X 48-hour	report New repr	ort [ ] Amends repo	ort filed on
Full Name of Payee Buying Time, LLC	emination: 10/11/16		Date of Public Distribution/Dissemination
Mailing Address 650 Massachusetts Ave			10   11   2010
Suite 210	AIGG, IXVV		Amount
City	State	Zip Cods	57500.00
Washington	DC	20001	Transaction to : SE-951439  Date of Disbursement or Obligation
Purpose of Expenditure Media Buy		Cutogory/ Type 004	10 11 2018
Name of Federal Candidate	<u> </u>	Support	Office Sought:   House District: 00
Trump, Donald, J., ,		X Oppose	X President Senate State:
Calendar Year-To-Date Per Election for Office Sought	to the second and the	1459931.62.	Disbursement For: ☐ Primary
Full Name of Payee Screen Strategies Media, LLC Date of Disse	C emkstion: 10/12/16		Date of Public Distribution/Dissemination
Mailing Address 11150 Fairfax Glvd			Amount
Suite 505			Line to A transf the silve strengton the sale
City	State	Zip Code 22030	74632.00 Transaction ID : SE-951438
Fairfax		722030	Date of Disbursement or Obligation
Purpose of Expenditure Media Buy	,	Category/ 004	10 1 11 2016
Name of Federal Candidate Trump, Donald, J., ,		Support Oppose	Office Sought: House District: 00
Calendar Year-To-Date Per Election for Office Sought		1534583.62	Disbursoment For: Primary X Goneral 2016
(a) SUBTOTAL of itemized independent	Expenditures		ي وقاص دود العمال د مستعدد ي
(b) SUBTOTAL of Unitermized Independen	nt Expenditures	***************************************	and the College of the second
(c) TOTAL Independent Expenditures			170032.00
Under penalty of perjury i certify that the with, or at the request or suggestion of, a party committee) any political party comm	any candidate or authorized	reported herein were committee or agent of	not made in cooperation, consultation, or concert' of either, or (if the reporting entity is not a political
Ward, Kelly. C., .	(Et		w a sylvania
Signature	/Electroni	leally Filed Date	10 13 , 2016

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)	PAGE 17 OF 17 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER ▼ C C00000935
Check if 24-hour report 48-hour report New report Amends report tiled	on [ " " " " " " " " " " " " " " " " " "
Full Name of Payao Screen Strategies Media, LLC Date of Dissemination: 10/20/16	Date of Public Distribution/Dissemination
Mailing Address 11150 Fairfax Blvd • Suite 505	Amount
City State Zip Code VA 22030	107040.00 4 Transaction ID : SE-952389 Date of Disbursement or Obligation
Purpose of Expanditure Media Buy  Category/ Type  O04	10 18 2016
Donald J. Trump	President Senate State:
Calender Year-To-Date Per Election for Office Sought 2989611.20 Disbut 2016	rscment For: ☐ Primary ☐ General  Other (specify) ▶
Full Name of Payed AL Media LLC  Date of Dissemination: 10/20/16	Date of Public Distribution/Dissemination
Mailing Address 222 W Ontario St Suite 600	Amount
City State Zip Code Chicago IL 60654	Transaction ID : SE-952071 Date of Disbursoment or Obligation
Purpose of Expenditure Media Buy  Category/ Type  Out  Type	10 17 2016
	President Senate State:
Calendar Year-To-Date Per Election for Office Sought  Disburger 2989611.20 2016	ursement For: Primary General Other (specify)
(a) SUBTOTAL of itemized independent Expenditures	247290.00
(b) SUBTOTAL of Unitemized Independent Expenditures	
(c) TOTAL independent Expenditures	652070.38
Under penalty of perjury I certify that the independent expenditures reported herein were not ma with, or at the request or suggestion of, any candidate or authorized committee or agent of either party committee) any political party committee or its agent.	de in cooperation, consultation, or concert , or (if the reporting entity is not a political
Kelly C. Ward  Date  Signature	0 21 2016

	/48 HOUR REPORT OF INDEPENDEN chedule E)	IT EXPE	NDI	TURES		PAGE 19	OF 15 F FORM 24/48
NÄ	ME OF COMMITTEE (In Full)					FEC IDENTIFICAT	
	CCC					,.,.	
						C C00000935	
	· · · · · · · · · · · · · · · · · · ·			· · · · · · · · · · · · · · · · · · ·		1 0 1 3 5 1	
Ch	eck if X 24-hour report 48-hour report	Net	v repo	ort 🗀 Amends repo	ort filed	on	, , , ,
-				.,		<u> </u>	* *
	Full Name of Payee Prism Communications, Inc.					Date of Public Distribution	/Dissemination
	Date of Dissemination:	10/27/16				10 27 1	2016
	Mailing Address 1000 Potomac Street, NW						
	Suite 420					Amount	
	City	State		Zip Code			3291.58
	Washington	DC		20007		Transaction ID : SE-9539	
	Purpose of Expenditure			<del></del>		Date of Disbursement or	
	Media Production			Category/ Type 004	-	10 26	2016
				Турс			_
l	Name of Federal Candidate	_		Support	Office	Sought: House	District: 00
4	Donald J. Trump			Oppose	X	President Senata	State:
	Colondo Vara To Davi	<del></del>				rsement For:   Primar	
	Calendar Year-To-Date Per Election for Office Sought			50355.45	2016	_	, 'S' Geriera
	<u> </u>	1	<u></u>	<u> </u>	<u> </u>	Other (specify)	
	Full Name of Payee 76 Words Corp.					Date of Public Distribution	
	Date of Dissemination:	10/26/16				10 26	2016
	Mailing Address ; 121 5th St. NW					•	· -'
	Floor#1					Amount	
	City	State		Zip Code		· · · .	5500.00
	Washington	DC		20001		Transaction ID : SE-95417	ا معلوا المساقم المساقم 1
						Date of Disbursement or	
	Purpose of Expenditure Media Production			Category/ 004	-	10 27	2016
				Type 554			-
	Name of Federal Candidate			Support	Offic	Sought: House	District: 00
į	Donald J. Trump			) Oppose	l ix	President Senate	State:
					- Jimes	ursement For: Primar	
	Calendar Year-To-Date Per Election for Office Sought			4436718.92	2016		A IV. General
		· ·	<u>.</u>	<u> </u>		Other (specify) -	
	(a) SUBTOTAL of Itemized Independent Expanditure	es			·· <b>•</b>	,	8791.58
	(b) SUBTOTAL of Unitemized Independent Expendi	tures	*****		·· •		
	(c) TOTAL Independent Expenditures	••••••			▶		771178.77
						4.	
	Under penalty of perjury I certify that the independence with, or at the request or suggestion of, any candidate						
	party committee) any political party committee or its			Telemon or allow c	uni#5	, o. to the charming county	
	•						
	Kelly C. Ward				i	·11 / 5	γ v·
	Signature			. Date	, 1	0 27 20	10
					-		

	/48 HOUR REPORT OF INDEPENDENT EXPENDITURES chedule E)	1,000	AGE 22 OF 25 OR SE OF FORM 24/48
N	AME OF COMMITTEE (In Full)	<del></del>	NTIFICATION NUMBER >
ב	OCCC		
		,C, ∞	0000935
Cr	eck if [_] 24-hour report	1 on .	0 0 1 1 T1 - T1 TV 1 T1
	Full Name of Payee	Date of Public D	latribution/Dissemination
	Kully Hall, LLC Date of Dissemination: 10/12/16	"10"	0 ii / 1 v v v v 12 v 2016
	Mailing Address 1932 1st Ave, Sulte 203		. 2010
		Amount	
	City State Zip Code		4297.00
	Seattle WA 98101	Transaction ID : Date of Disburse	SE-951665
	Purpose of Expenditure Media Buy Media Production  Category/ Typo ;	ี้ 10	14 2016
	Name of Federal Candidato Support Office	e Sought:	Hause District: 00
	Donald J. Trump X Oppose	President	Senate Slate:
		ursement For:	Primary X General
	Per Election for Office Sought 1721688.30 2016	Olher (specia	
	Full Name of Payee		istribution/Dissemination
	The New Media Firm, Inc.		
	Date of Dissemination: 10/12/16	10	12 2016
	Mailing Address 1730 Rhode Island Avo., NW	Amount	
	Sulte 213		
	Cily State Zip Code		56930.43
	Washington DC 20036	Transaction ID : S Date of Disburse	SE-951666 ement or Obligation
	Purpose of Expanditure  Media Buy  Category/ Type  Code		12 2016
	Name of Federal Candidate     Support   Offic	e Sought:	House District: 00
	Donald J. Trump	President	Seneto State:
	- FY		Primary Seneral
ı	Calendar Your To-Date Per Election for Office Sought 1721688.30	,	
_		Other (spoci	ΙΥ) -
	(a) SUBTOTAL of Itomized Independent Expenditures	e	61227.43
	the CIDIOTAL of University Independent Eveneditures		• • • • •
	(b) SUBTOTAL of Uniternized Independent Expenditures		!
	(c) TOTAL Independent Expenditures	•	
	(4) TOTAL MODERACION Experience Communication and Communication an	. في د	
	Under penalty of perjury I certify that the independent exponditures reported herein were not maken, or at the request or suggestion of, any candidate or authorized committee or agent of either party committee) any political party committee or its agent.	ade in cooperation, r, or (II the reportin	consultation or concert ag entity is not a political
	Walls C Ward		
	Kelly C. Ward Date 1	0 14	2016
	Signature		

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## 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)

•	FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER ▼
	C C00000935
Check if 24-hour report	on Mary Condition
Full Name of Payee	Date of Public Distribution/Dissemination
The New Media Firm, Inc.  Date of Dissemination: 10/12/16	10 12 2016
Mailing Address 1730 Rhode Island Ave., NW Suite 213	Amount
City State Zip Code	4047.25
Washington DC 20036	Transaction ID : SE-951654  Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Media Production  Category/ Type	10 12 2016
Name of Federal Candidate Support Office	Sought: House District: 00
Trump, Donald, J.,	President Senate State:
Odional iou io baio	ursement For: Primary X General
Per Election for Office Sought 1721688.30 2016	Other (specify) >
Full Name of Payee	Date of Public Distribution/Dissemination
Screen Strategies Media, LLC Date of Dissemination: 10/12/16	10 12 2016
Mailing Address 11150 Fairfax Blvd	
Suite 505	Amount
City State Zip Code	121850.00
Fairfax VA 22030	Transaction ID : SE-951660  Date of Disbursement or Obligation
Purpose of Expenditure Media Buy  Category/ Type  Out Type	10 12 1 2016
Name of Federal Candidate Support Office	Sought: House District: 00
Trump, Donald, J., ,	President Senate State:
Calcitud feditionals	ursement For: Primary X General
Per Election for Office Sought 1721688.30 2016	Other (specify) -
(a) SUBTOTAL of Itemized Independent Expenditures	125897.25
(b) SUBTOTAL of Uniternized Independent Expenditures	
(c) TOTAL Independent Expenditures	
Under penalty of perjury I certify that the independent expenditures reported herein were not may with, or at the request or suggestion of, any candidate or authorized committee or agent of either	
party committee) any political party committee or its agent.	,
	· ba / 0 ° ° ° 1 √ ° √ · ∀ ° ∨ ° ° ° 0 ° ° ° ° ° ° ° ° ° ° ° ° ° °
Signature	

PAGE 21

OF

25

# Image# 201610189033039655 24/48 HOUR REPORT OF INDEPENDENT EXPENDIȚURES (Schedule E)

Schedule E)	PAGE 21 OF 25 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER ▼
DCCC	C C00000935
Check if 24-hour report 48-hour report New report Amends report filed on	10 14 2016
	te of Public Distribution/Dissemination
The New Media Firm, Inc.  Date of Dissemination: 10/12/16	10 12 2016
	Taurium Smalama ilumbaniumand Jount
Suite 213	استرستان بدرستهسان دوسترد دود
	4047.25 Insaction ID : SE-952372 te of Disbursement or Obligation
Purpose of Expenditure Media Buy Media Production  Category/: 1 Type	N N 1 10 1 14 2016
Name of Federal Candidate Support Office Sou	ught: House District: 00
Trump, Donald, J., .	
Calendar Year-To-Date Per Election for Office Sought  Disbursem 2016	nent For: Primary Seneral Other (specify)
Full Name of Payee Date	te of Public Distribution/Dissemination
Screen Strategies Media, LLC Date of Dissemination: 10/12/16	10 12 2016
Malling Address 11150 Fairfax Blvd	tount
Suite 505	a frank of a series safes. L'homme han alla demployment describes
City State Zip Code Fairfax VA 22030 Tran	121850.00 nsaction ID : SE-952373
Durages of Europediture	te of Disbursement or Obligation
Media Buy  Category/ Type  O04  Type	10 14 2016
Name of Federal Candidate Support Office Sou	ught: House District: 00
Trump, Donald, J., ,	sident Senate State:
Calendar Year-To-Date Per Election for Office Sought  Disbursem 2016	nent For: Primary Seneral Other (specify)
· -	
(a) SUBTOTAL of Itemized Independent Expenditures	125897.25
(b) SUBTOTAL of Unitemized Independent Expenditures	
(c) TOTAL Independent Expenditures	ganneg i legeste jerg ji niyar gasta gasta jarang Ganada i Panada istang kanada legeste kila d
Under penalty of perjury I certify that the independent expenditures reported herein were not made in with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or party committee) any political party committee or its agent.	n cooperation, consultation, or concert (If the reporting entity is not a political
Ward, Kelly, C [Electronically Filed] Date 10	18 2016
Signature	

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	PAGE 3 OF 3
(Schedule E)	FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER ▼
DCCC	C c00000935
Check if 24-hour report 48-hour report New report Amends report field of	ou The state of th
Full Name of Payee	Date of Public Distribution/Dissemination
Buying Time, LLC Date of Dissemination: 10/11/16	10 11 2016
Mailing Address 650 Massachusetts Avenue, NW	
Sulte 210	Amount
City State Zip Code	57500.00
Washington DC 20001	Transaction ID: SE-951439 Date of Disbursement or Obligation
Purposo of Expenditure Media Buy  Category/ Type: 004	10 11 2016
Name of Federal Candidato Support Office	Sought: House District: 00
Donald J. Trump Oppose	President Senate State:
Calendar Year-To-Oate Per Election for Office Sought  Disburg 2018	sement For: ☐ Primary ☐ General ☐ Other (specify) ▶
Full Name of Payee	Date of Public Distribution/Dissemination
Screen Strategies Media, LLC Dute of Dissemination: 10/12/16	10 12 2016
Mailing Address 11150 Fairfax Blvd	السميسيفين السياسية السياسية
Suite 505	Amount
Cliy State Zip Code	74632.00
	Fransaction ID : SE-951438 Date of Disbursement or Obligation
Purpose of Expenditure Modia Buy  Category/ Type  Out Type	10 11 2016
Name of Federal Candidate Support Office	Sought: House District: 00
Donald J. Trump X Oppose X 1	President Senete State:
Calendar Year To-Date Per Election for Office Sought , 1534563.62 Disburs 2016	sement For: Primary
(a) SUBTOTAL of Itemized Independent Expenditures	132132.00
(b) SUBTOTAL of Uniternized Independent Expenditures	g score a sa bisine arasabasak a e
(c) TOTAL Independent Expenditures	170032.00
Under penalty of perjury I certify that the independent expenditures reported herein were not mad with, or at the request or suggestion of, any candidate or authorized committee or agent of either, party committee) any political party committee or its agent.	le in cooperation, consultation, or concert or (if the reporting entity is not a political
Kally C. Ward	1 13 2016
Signature Cale ; 10	1 13 2016

24/48 HOUR REPORT OF INDEPE	NDENT EXPEND	ITURES	PAGE 50 OF 60
(Schedule E)			FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)			FEC IDENTIFICATION NUMBER Y
DCCC			C C00000935
Check if 24-hour report ( 48-hour rep	ort New rep	port Amonds repo	ort ided on
Full Name of Payee Screen Strategies Media, LLC Date of Dissemir	) pation: 10/25/16		Date of Public Distribution/Dissemination
Mailing Address 11150 Foirfax Blvd			
Sulte 505			Amount
City	State	Zio Code	121850.00
Fairfax	VA	22030	Transaction ID : SE-952388  Date of Disbursement or Obligation
Purpose of Expenditure Media Buy		Category/ Type 004	10   18   2018
Name of Federal Candidate		Support	Office Sought: House District: 00
Donald J. Trump		Oppose	President Senate State:
Calendar Year-To-Date Per Election for Office Sought		369947.93	Disbursement For: Primary General 2016
	16 3	1 7	Other (specify)
Full Name of Payee  Buying Time, LLC  Date of Dissemir	nation: 10/25/16		Date of Public Distribution/Dissemination
Mailing Address 650 Massachusetts Aven			أساب المسلم المسلم الراث
Suite 210			Amount
City	State	Zip Code	19691.00
Washington	DC	20001	Transaction ID : SE-953229  Date of Disbursement or Obligation
Purpose of Expenditure Media Buy		Category/ 1 004	10 24 2016
Name of Federal Candidate		Support	Office Sought:   House District: 00
Donald J. Trump		iX Oppose	President Senate State:
Calendar Year-To-Dato Per Election for Office Sought		4369947.93	Disbursement For: Primary General
The Electrical Called Clough	. 1	· ·	Other (specify)
(a) SUBTOTAL of Itemized Independent Exp	enditures	,,, <u>,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,</u>	141541.00
(b) SUBTOTAL of Unitemized Independent E	xpenditures		•
(c) TOTAL Independent Expenditures		,	The state of the s
Under penalty of perjury I certify that the inc with, or at the request or suggestion of, any party committee) any political party committee	candidate or authorized	s reported herein were d committee or agent o	not made in cooperation, consultation, or concert f either, or (if the reporting entity is not a political
Kello C Ward		Date	10 25 2016
Signature			, , , , , , , , , , , , , , , , , , ,

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)	PAGE 57 OF 57
· · · · · · · · · · · · · · · · · · ·	FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER ▼
DCCC	C C00000935
Check If   24-hour report   48-hour report   New report   Amends report	flied on Turk / Corp.
Full Name of Payee Buying Time, LLC Date of Dissemination: 11/01/16	Date of Public Distribution/Dissemination
Malling Address 650 Massachusells Avenue, NW	- Lind Lind Linds
Suite 210	Amount
City State Zip Code	17175.00
Washington . DC 20001	Transaction ID : SE-954373  Date of Disbursement or Obligation
Purpose of Exponditure Media Buy  Catagory/ Type  Catagory/ Type	10 28 2016
Name of Federal Candidate Support	Office Sought: House District: 00
Donald J. Trump Oppose	President Senate State:
	Disbursement For: Primary General 2016 Other (specify)
Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 11/01/16  Mailing Address 11150 Fairfay Rhyd	Date of Public Distribution/Dissemination
Maning Address 11150 Fairfax Blvd Suite 505	Amount
City State Zlp Code	74850.00
Fairfax VA 22030	Transaction ID : SE-954175  Date of Disbursement or Obligation
Purpose of Expenditure Media Buy  Category/ Type  004	10 27 2018
Name of Federal Candidate Support (	Office Sought: House District: 00
Donald J. Trump Oppose	President Scnate State:
	Disbursement For: Primary Goneral 2016 Other (specify)
(a) SUBTOTAL of Itemized Independent Expenditures	92025.00
(b) SUBTOTAL of Unitemized Independent Expenditures	has been been been been been been been bee
(c) TOTAL Independent Europelitung	formation of the state of the s
(c) TOTAL Independent Expenditures	14333615.05 [
Under penalty of perjury I certify that the independent expenditures reported herein were no with, or at the request or suggestion of, any candidate or authorized committee or agent of eparty committee) any political party committee or its agent.	of made in cooperation, consultation, or concert elither, or (if the reporting entity is not a political
Kelly C. Ward	ያነው እነው <sub>እን በ</sub> የነኝነ ለነፍ ነ <i>የ ነነሜ ነምን የሞሞማ ነ</i> ፃነር
Signature	11 02 2016

## Image# 201611069037127397 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)

Schedule E)	PAGE 11 OF 12 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER ▼
DCCC	C c00000935
Check if 24-hour report 48-hour report New report Amends report filed o	U [NEW] , [OEO] , [LEASEN]
Full Name of Payee	Date of Public Distribution/Dissemination
Screen Strategies Media, LLC Date of Dissemination: 11/05/16	11 05 2016
Mailing Address 11150 Fairfax Blvd	Amount
Suite 505	
City State Zip Code	58700.00
	Transaction ID : SE-954453 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy  Category/ Type  004	10 31 2016
Name of Federal Candidate Support Office	Sought: House District: 00
Trump, Donald, J.,	President Senate State:
Calendar Year-To-Date Per Election for Office Sought  Disburs 2016	sement For: Primary Seneral Other (specify) >
	Date of Public Distribution/Dissemination
Canal Partners Media, LLC Date of Dissemination: 11/06/16	11 06 2016
Mailing Address 25 Whitlock Place	Amount
Suite 200	<del></del>
City State Zip Code  Marietta GA 30064	7910.00 ransaction ID : SE-954884 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy  Category/ Type  004	11 03 2016
Name of Federal Candidate Support Office	Sought: House District: 00
Trump, Donald, J.,	President Senate State:
Calendar Year-To-Date Per Election for Office Sought  Disburg 2016	sement For:  Primary
1	
(a) SUBTOTAL of Itemized Independent Expenditures	66610.00
(b) SUBTOTAL of Uniternized Independent Expenditures	
(c) TOTAL Independent Expenditures	
Under penalty of perjury I certify that the independent expenditures reported herein were not mad with, or at the request or suggestion of, any candidate or authorized committee or agent of either, party committee) any political party committee or its agent.	de in cooperation, consultation, or concert or (if the reporting entity is not a political
Ward, Kelly, C [Electronically Filed] Date 11	06 2016
Signature	nga territaina kajantajantinakajant

iitrage#	20101010	8022028023					
24/48	HOUR	REPORT	OF	INDEPEN	IDENT	EXPEND	ITI

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES Schedule E)	PAGE 19 OF 25
	FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER ▼
	C c00000935
Check if 24-hour report 🗷 48-hour report 🔊 🗌 New report 🗷 Amends report filled	on 10 14 2016
Full Name of Payee Ralston Lapp Media, LLC Date of Dissemination: 10/14/16	Date of Public Distribution/Dissemination
Mailing Address 1054 31st Street, NW	10 14 2016
Suite 430	Amount
City State Zip Code	12260.71
Washington DC 20007	Transaction ID : SE-951677 Date of Disbursement or Obligation
Purpose of Expenditure Media Production  Category/ Type  Out Type	10 14 2016
Name of Federal Candidate Support Office	Sought: 🕱 House District: 23
Hurd, William,	President Senate State: TX
Calendar Year-To-Date Per Election for Office Sought  Disbut 2016	rrsement For: Primary   General  Other (specify)
Full Name of Payee Buying Time, LLC Date of Dissemination: 10/14/16 Mailing Address 650 Massachusetts Avenue, NW	Date of Public Distribution/Dissemination
Sulte 210	Amount
City State Zip Code Washington DC 20001	53000.00 Transaction ID : SE-952374
Durance of Succeediture	Date of Disbursement or Obligation
Media Buy  Category/ Type  O04	10 / 13 / 2016
Name of Federal Candidate Support Office	B Sought: House District: 00
Trump, Donald, J.,	President Senate State:
Calendar Year-To-Date Per Election for Office Sought  Disbu 2016	ursement For: Primary   General  Other (specify) ▶
(a) SUBTOTAL of Itemized Independent Expenditures	65260.71
(b) SUBTOTAL of Unitemized Independent Expenditures	
(c) TOTAL Independent Expenditures	
Under penalty of perjury I certify that the independent expenditures reported herein were not movin, or at the request or suggestion of, any candidate or authorized committee or agent of either party committee) any political party committee or its agent.	ade in cooperation, consultation, or concert r, or (If the reporting entity is not a political
Ward, Kelly, C., .  Electronically Filed  Date 1	0 18 2016
Signature	

Image# 201610199033071490 24/48 HOUR REPORT OF INDE	:DENDENT EYDEND	ITUDES				
(Schedule E)	PENDEN! EAFEND	IIUneo		~	PAGE 52	OF 52
NAME OF COMMITTEE (In Full)				FEC ID		ION NUMBER V
DCCC				1	C00000935	
Check if 24-hour report # 48-hou	r report New rep	ort Amends repo	rt filed on	W7"]	DAR (	
Full Name of Payee The New Media Firm, Inc. Date of Dis	semination: 10/18/16		Date	of Public	Distribution	VDissemination
Mailing Address 1730 Rhode Island Av			t		لستسا	2010
Suite 213			Amo	unl		
City	State	Zip Code			<del></del>	3407.87
Washington	DC	20036			ID : SE-9523 irsement or	<del></del>
Purpose of Expenditure Media Buy Media Production		Category/ Type	]   [	10	18	2016
Name of Federal Candidate		Support	Office Sou	ıht:	House	District: 00
Trump, Donald, J., ,		X Oppose	<b>⋉</b> Presi	dent [	Senate	State:
Calendar Year-To-Date Per Election for Offico Sought		2613000.20	Disburseme	int For: Other (sp	Primar	y X General
Full Name of Payee Buying Time, LLC Date of Dis	, ssemination: 10/18/16		Date	of Publi	c Distribution	n/Dissemination 2016
Mailing Address 650 Massachusetts	Avenue, NW				-	
Suite 210			Amo	uni		
City	State	Zip Code		ا ( إسماليسما	ه ( المستقيد	83829.00
Washington Purpose of Expenditure	DC	20001			D : SE-95207 ursement or	
Media Buy		Category/ Type 004		10	17	2016
Name of Federal Candidate		Support	Office Sou	ght:	House	District: 00
Trump, Donald, J., ,		X Oppose	₩ Pres	dent [	Senale	State:
Calendar Year-To-Date Per Election for Office Sought		2613000.20	Disburseme 2016	ent For: Other (sp	Primai	ry 🕱 General
(e) SUBTOTAL of Ilemized Independen	nt Expenditures		· [			87236.87
(b) SUBTOTAL of Unitermized Independent	dent Expenditures	***************************************	· · [		· · · · · · · · · · · · · · · · · · ·	
(c) TOTAL Independent Expenditures			· · ·	- A49:	4 - 4 - 01	11152409.38

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

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Ward, Kelly. C., ,	[Electronically Filed] Da	e 10	19	2016
Signature		المصال		

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)	PAGE 52 OF 80
·	FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER V
	C : c00000935
Check if X 24-hour report 48-hour report New report Amends report filed	on
Full Name of Payer Screen Strategies Media, LLC	Date of Public Distribution/Dissemination
Date of Dissomination: 10/25/16  Mailing Address 11150 Fairfax Blvd	10 25 2016
Suite 505	Amount
City State Zip Code	64326.00
Falrlax VA 22030	Tronsaction ID : SE-953184 Date of Disbursement or Obligation
Purpose of Expenditure  Modia Buy  Category/ Type: 064	10 21 2016
Name of Federal Candidate Support Office	Sought: House District: 00
Donald J. Trump Oppose	President Senate State:
Per Election for Office Sought 4369947.93 2016	rsement For: Primary General Other (specify) ▶
Full Name of Payee Buying Time, LLC	Date of Public Distribution/Dissemination
Date of Dissamination: 10/25/16  Mailing Address ASO Massachusetts Avouse NW	10 25 2016
VOV INCIDENTIAL CATALOGY, TITT	Amount
Suite 210 City Slate Zlp Code	62488.00
	Transaction ID : SE-953185  Date of Diabursoment or Obligation
Purpose of Expanditure Media Buy  Category/ Type  O04	10 1 21 1 2016
Name of Federal Candidate Support Office	Sought: House District: 00
Donald J. Trump Coppose	President Senato State:
Calendar Year-Tc-Date Per Election for Office Sought  Disbut 2016	resement For: Primary Seneral  Other (specify) ▶
	Curier (spaciny)
(a) SUBTOTAL of Itemized Independent Expenditures	126814.00
(b) SUBTOTAL of Unitemized Independent Expenditures	
	the state of the s
(c) TOTAL Independent Expenditures	n mar mar d
Under panalty of parjury I certify that the independent expanditures reported herein were not ma with, or at the request or suggestion of, any candidate or authorized committee or agent of either, party committee) any political party committee or its agent.	de in cooperation, consultation, or concert ; or (if the reporting entity is not a political
Kelly C. Ward - a - Date - 10	0 (25 1 2016
Signalure	(,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,